

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

v.

MULLEN INDUSTRIES LLC
Patent Owner.

Case No. IPR2025-00019
Patent No. 9,204,283

**PETITION FOR INTER PARTES REVIEW
UNDER 35 U.S.C. §§311-319 AND 37 C.F.R. §42.1 et seq.**

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APPENDIX LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 9,204,283 (“the ’283 patent”)
1002	Prosecution History of U.S. Patent No. 9,204,283
1003	Declaration of David H. Williams (“Williams-Decl.”)
1004	Curriculum Vitae of David H. Williams
1005	U.S. Patent No. 7,333,820 (“Sheha”)
1006	U.S. Provisional Patent Application No. 60/305,975 (“Sheha-Prov.”)
1007	U.S. Patent Application Publication No. 2004/0024846 (“Randall”)
1008	International Patent Application Publication No. WO 02/17075 (“Randall-WIPO”)
1009	RESERVED
1010	RESERVED
1011	RESERVED
1012	RESERVED
1013	RESERVED
1014	U.S. Patent No. 6,920,328 (“Wollrab”)
1015	U.S. Patent No. 6,714,791 (“Friedman”)
1016	U.S. Patent Application Publication No. 2002/0145561 (“Sandhu”)
1017	U.S. Patent No. 6,885,874 (“Grube”)
1018	U.S. Patent No. 6,716,101 (“Meadows”)
1019	U.S. Patent No. 7,366,522 (“Thomas”)
1020	U.S. Patent No. 5,736,960 (“Murphy”)
1021	U.S. Patent No. 5,923,286 (“Divakaruni”)
1022	International Patent Application Publication No. WO 01/91486 (“Darling”)
1023	U.S. Patent No. 6,084,951 (“Smith”)
1024	U.S. Patent No. 6,714,793 (“Carey”)
1025	U.S. Patent No. 6,415,224 (“Wako”)

Exhibit	Description
1026	U.S. Patent No. 6,993,658 (“Engberg”)
1027	Korean Patent Application Publication No. 10-2001-0091381 (“Han”)
1028	U.S. Patent No. 7,080,124 (“Shankar”)
1029	U.S. Patent No. 6,456,854 (“Chern”)
1030	U.S. Patent No. 6,754,665 (“Futagami”)
1031	U.S. Patent No. 6,292,657 (“Laursen”)
1032	U.S. Patent Application Publication No. 2003/0097596 (“Muratov”)
1033	U.S. Patent No. 5,613,012 (“Hoffman”)
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1035	International Patent Application Publication No. WO 00/22860 (“Degnbol”)
1036	Civil Docket Report in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (last checked October 7, 2024)
1037	Federal Court Management Statistics–Profiles, U.S. District Courts–Combined Civil and Criminal (June 30, 2024) (available at https://www.uscourts.gov/file/78871/download)
1038	Docket Control Order in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (June 14, 2024) (Dkt. 30)
1039	Plaintiff’s Disclosure of Asserted Claims and Infringement Contentions in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (May 15, 2024)

MANDATORY NOTICES

A. Real Party-In-Interest

Google LLC,¹ Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. are the real parties-in-interest.

B. Related Matters

1. United States Patent & Trademark Office

The application from which U.S. Patent No. 9,204,283 (“the ’283 patent”) issued (U.S. Patent Application No. 11/462,201) is a Continuation of U.S. Patent Application No. 10/400,296 (U.S. Patent No. 9,635,540), filed March 25, 2003.

The following applications are also Continuations of U.S. Patent Application No. 10/400,296 (U.S. Patent No. 9,635,540):

- U.S. Patent Application No. 11/387,384 (U.S. Patent No. 8,374,575), filed March 22, 2006;
- U.S. Patent Application No. 11/485,161 (U.S. Patent No. 11,122,418), filed July 12, 2006;
- U.S. Patent Application No. 11/834,674 (U.S. Patent No. 11,234,117), filed August 6, 2007;

¹ Google LLC is a subsidiary of XXVI Holdings Inc., which is a subsidiary of Alphabet Inc. XXVI Holdings Inc. and Alphabet Inc. are not real parties-in-interest to this proceeding.

- U.S. Patent Application No. 11/841,734 (U.S. Patent No. 11,109,218), filed August 20, 2007;
- U.S. Patent Application No. 11/841,750 (U.S. Patent No. 11,096,039), filed August 20, 2007;
- U.S. Patent Application No. 11/841,765 (U.S. Patent No. 11,246,024), filed August 20, 2007;
- U.S. Patent Application No. 17/665,568 (abandoned), filed February 6, 2022.

U.S. Patent No. 9,204,283 also claims priority to U.S. Provisional Application No. 60/367,967, filed March 25, 2002.

2. USPTO Patent Trial and Appeal Board

The '283 patent was at issue in *Apple Inc. v. Mullen Industries LLC*, Case No. IPR2023-00091.

Petitioners are concurrently filing a petition for *inter partes* review of U.S. Patent No. 11,122,418, under Case No. IPR2025-00018.

3. U.S. District Court for the Eastern District of Texas

The '283 patent is currently asserted in *Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:24-cv-00049.

4. U.S. District Court for the Northern District of California

The '283 patent was previously asserted in *Mullen Industries LLC v. Apple Inc.*, Case No. 5:23-cv-00437 (terminated).

5. U.S. District Court for the Western District of Texas

The '283 patent was previously asserted in *Mullen Industries LLC v. Apple Inc.*, Case No. 6:22-cv-00145 (transferred and terminated).

C. Counsel and Service Information - §42.8(b)(3) and (4)

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Powers of attorney are submitted with the Petition. Counsel for Petitioners consent to service of all documents via electronic mail.

Petitioners request *inter partes* review and cancellation of claims 1-20 of the '283 patent (EX1001).

I. INTRODUCTION

The '283 patent is one of eight related patents that Patent Owner ("Mullen") has accused Petitioners' products of infringing in pending litigation. Previously, Mullen asserted these patents against Apple Inc., and Apple filed IPRs. Apple's IPR2023-00091 challenging the '283 patent was instituted and then terminated due to settlement during trial.

This Petition presents two sets of grounds against all claims: one set of grounds based on Sheha, under which the Board previously found a reasonable likelihood of unpatentability (IPR2023-00091, Paper 9 at 27-28); and a new set of grounds based on Randall, which have not previously been before the Board. All of the '283 patent's claims are unpatentable under either set of grounds.

Declaration of David H. Williams (EX1003, "Williams-Decl."), [0088].

II. STANDING

Petitioners certify that the '283 patent is available for *inter partes* review and that Petitioners are not barred or estopped from requesting *inter partes* review as to the challenged claims. 37 C.F.R. §42.104(a).

III. GROUNDS FOR UNPATENTABILITY

The challenged claims are unpatentable under pre-AIA 35 U.S.C. §103 according to the following grounds:

Ground Number and Reference(s)		Claims
1	Sheha (EX1005), Smith (EX1023), Carey (EX1024)	1-2, 6-9, 13, 15-17
2	Sheha, Smith, Carey, Wako (EX1025)	3-5, 10-12, 14, 19-20
3	Sheha, Smith, Carey, Engberg (EX1026)	18
4	Randall (EX1007)	1-2, 6-9, 13, 15-17
5	Randall, Wako	3-5, 10-12, 14, 19-20
6	Randall, Engberg	18

Each reference above is prior art under at least pre-AIA 35 U.S.C. §102(e), even if the claims are entitled to the '283 patent's earliest claimed priority date. Smith is prior art under §102(b).

None of these references were relied on by the Examiner during prosecution of the '283 patent.

IV. THE '283 PATENT

A. Specification Embodiments

Generally, the '283 patent's specification is addressed to determining and sharing a location of a wireless device, such as via the Global Positioning System ("GPS"). EX1001, 1:18-28. The patent alleges that "GPS systems have been integrated into cellular phones" but "only minimally utilized," so the patent purports to provide functionality to allow one cellphone user to "locate the position of" another user's cellphone. EX1001, 1:28-43.

Cellphones in the '283 patent can share their locations with a remote system, from which other users can obtain them. EX1001, 5:7-29. A user can also restrict

access to their location by identifying authorized users or groups, thus specifying which other users may obtain their location information. EX1001, 3:22-30.

Figure 2's example method (below) to obtain another user's location generally includes sending a request for the location, determining whether the requesting user is authorized, and, if so, providing the location to the requestor.

The location can be displayed on a map. EX1001, 8:1-3.

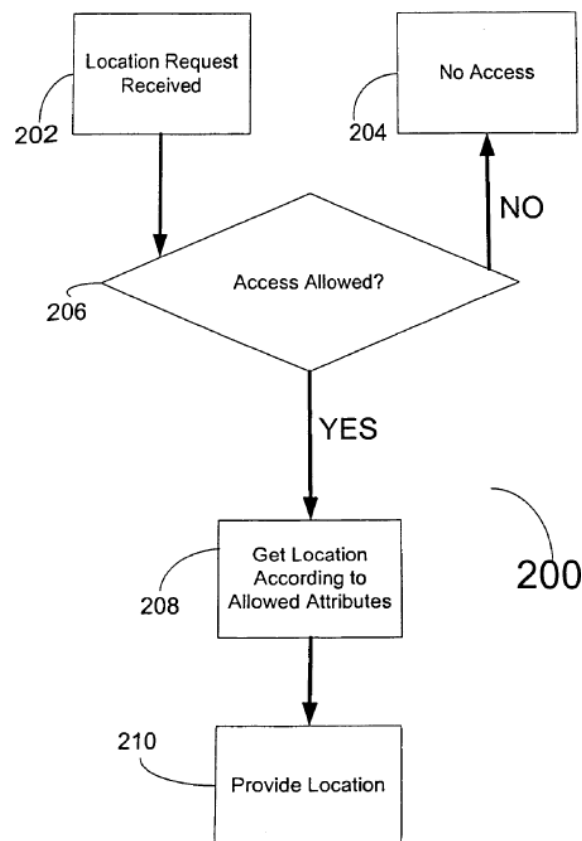


FIG. 2

Some embodiments require a user to enter a login and password, to identify the user before the user's profile is updated with their current location and before

the user requests other users' locations. EX1001, 2:57-5:7, 3:26-30, 9:39-10:6.

Williams-Decl., [0055]-[0059].

B. Person of Ordinary Skill in the Art (“POSA”)

A POSA as of the '283 patent's earliest claimed priority date would have had a bachelor's degree in computer science, computer engineering, electrical engineering, or a similar degree, with one or two years of experience with wireless networks and devices, such as cellphones and personal digital assistants (“PDAs”), as well as wireless positioning technologies, such as GPS or triangulation. More education could compensate for less practical experience, and vice versa.

Williams-Decl., [0050]-[0054].

C. Prosecution History

During the '283 patent's five years of prosecution over seven office actions, the applicant predominantly argued for patentability based on claimed functionality that the Examiner found to be well known and conventional, such as displaying lists of users and manual logins, passwords, and selections of users. *See, e.g.*, EX1002, pp. 123-127, 161-165, 201-204, 244-247, 314-316 (Applicant's remarks); EX1002, pp. 136-137, 175, 215-216, 259-263, 288, 326-329 (Examiner's remarks). After those arguments and related amendments failed to achieve allowance, the applicant agreed to an Examiner's amendment adding claim element [1G] (regarding “assign[ing] location access rights”). EX1002, pp. 368- 371, 427-428.

The Examiner then allowed the application, commenting only that the allowed independent claims “possess a unique combination of limitations that is not sufficiently taught or suggested by the prior art” of record in examination.

EX1002, p. 371. However, as demonstrated below, prior art not considered by the Examiner renders all challenged claims unpatentable. Williams-Decl., [0060].

D. Challenged Claims

The '283 patent's three independent claims 1, 8, and 15 each recite a process by which a user selects another user and provides a login and password. A system identifies the user from the login and password, determines whether the user has access rights to the location information for the selected user, and, if so, provides the location information to the requesting user's device where it is displayed.

Each of the dependent claims recites further functionality that was routine and conventional before the '283 patent's earliest claimed priority date—including GPS and triangulation, which the '283 patent admits was well known. EX1001, 1:17-33. Williams-Decl., [0061]-[0063].

V. CLAIM INTERPRETATION

Claim terms are construed herein using the standard used in civil actions under 35 U.S.C. §282(b), in accordance with the ordinary and customary meaning as understood by a POSA and the patent's prosecution history. 37 C.F.R. §42.100(b).

VI. GROUND 1: CLAIMS 1-2, 6-9, 13, 15-17 ARE UNPATENTABLE OVER SHEHA+SMITH+CAREY

Grounds 1-3 together demonstrate how the challenged claims are unpatentable over Sheha in combinations with Smith, Carey, Wako, and Engberg. The Board previously found a reasonable likelihood of unpatentability based on similar combinations of the same references. *See* IPR2023-00091, Paper 9 (granting institution). Mullen’s arguments made in IPR2023-00091 against these references were wrong as discussed in the sections below, and Mullen’s characterizations of Mr. Williams’s deposition testimony were inaccurate as Mr. Williams has explained. Williams-Decl., [0373]-[0387].

A. Sheha (EX1005)

Sheha claims priority to a provisional application filed on July 17, 2001. The provisional’s disclosure (EX1006) is substantively identical to that of Sheha and provides written description for Sheha’s claim 1. Williams-Decl., [0075]-[0080]. Thus, Sheha is prior art under pre-AIA 35 U.S.C. §102(e).

Sheha describes a system to enable functionality like mapping, routing, and direction finding by allowing telephone devices—landline or mobile, such as cellphones or PDAs—to share their locations with other authorized landline and mobile devices. Sheha, 2:60-4:18, 10:66-11:9. The mobile devices may determine their own positions, using GPS or other positioning technology, and report their positions to an online database and application server (“ODAS”) which stores

them. Sheha, 10:5-16, 10:66-11:54, 7:19-23. The mobile devices may specify groups of authorized users to the ODAS identifying who may obtain their respective location information. Sheha, 11:55-12:7.

A mobile device may request the location of a target mobile device through a phone call (“call embodiment”) or “without having to initiate a telephone call” (“no-call embodiment”) by “only specifying a telephone number.” Sheha, 11:10-54, 11:55-58; *see also id.*, 12:1-7. If authorized, the requesting device receives the position from the ODAS, which may include a map illustrating the location of one or both mobile devices, route information, driving directions, and heading information that may be displayed to the user. Sheha, 9:23-39. Figure 3 (below) illustrates an example system enabling such functionality between mobile devices 18b and 18c via wireless network 22 and ODAS 3. Williams-Decl., [0090]-[0094].

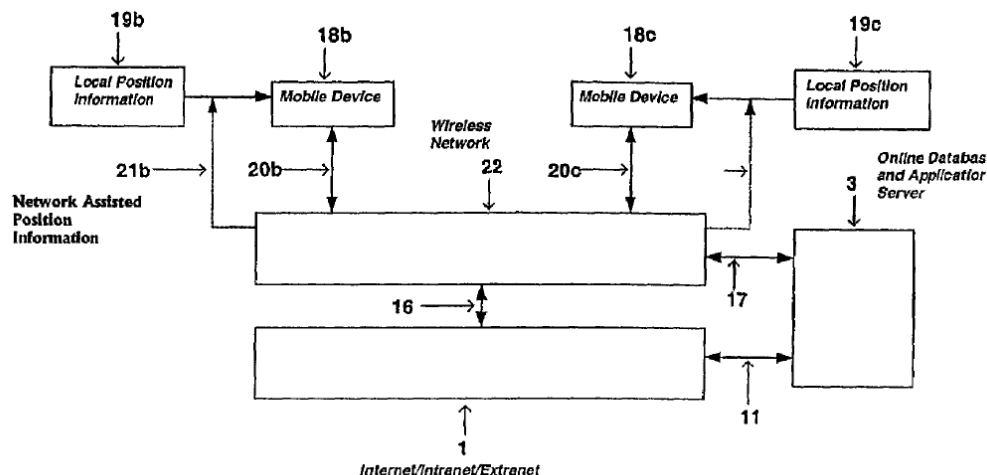


FIG. 3

B. Smith (EX1023)

Smith describes providing a user interface for a cellphone, including contact list functionality that can provide a wide variety of information about a corresponding contact, including location information such as GPS information. Smith, 5:15-18, 7:41-49, 10:29-11:4, FIG. 16. Smith allows a user to store detailed information for individual contacts. Smith, 6:53-7:3. The contact list view provides an icon providing a location associated with the contact, which may identify the location of a caller. Smith, 10:61-11:4; Williams-Decl., [0095]-[0096].

C. Carey (EX1024)

Carey describes a system to enable instant messaging between mobile wireless device users. Carey, Abstract, 1:8-12. A user can access an application to access an instant-messaging service on their cellphone, log into the application, and gain access to their address book to allow them to select and exchange instant messages with other users who are also signed into the service. Carey, 3:18-34, 4:6-33; 5:5-28, 7:65-8:16, FIGs. 8-14. As was conventional practice, Carey's device provides a screen to receive the user's login and password for authentication. Carey, 7:67-8:10, FIG. 8:

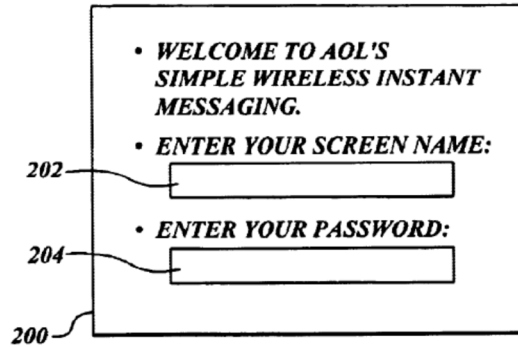


Fig. 8

Williams-Decl., [0097]-[0098].

D. Sheha-Smith-Carey Combination

As discussed *supra* §§VI.A-VI.C, each of Sheha, Smith, and Carey is directed to mobile devices or positioning. POSAs would have had motivation and reasonable expectation of success in combining teachings of the prior art including Sheha, Smith, and Carey. Williams-Decl., [0066]-[0074].

POSAs would have understood that Sheha's wireless telephones would typically have included conventional functionality as discussed in Smith, such as contact lists and manual input devices such as buttons to allow a user to interact with the device and contact-list functionality. Williams-Decl., [0099]. Because such functionalities were routine and conventional, POSAs would have had reasonable expectation of success in incorporating such functionality from Smith into Sheha's wireless devices. Williams-Decl., [0100].

Sheha's wireless telephones provide users with added functionality, such as location services, that require a user to enter authorization information to use such

added functionality, as described in Sheha. Williams-Decl., [0102]. A POSA considering how to implement functionality to allow a user to enter user authentication to access added functionality on a mobile device would have looked to a reference like Carey that describes functionality executing on wireless devices, such as cellphones, and how authentication information conventionally could be entered. Williams-Decl., [0101]-[0102]. Because Sheha describes using a location service involving user authentication, similar to the authentication process used to access Carey's instant-messaging functionality, a POSA would have had a reasonable expectation of success in incorporating teachings of authentication functionality from Carey into Sheha. Williams-Decl., [0102].

E. Mapping to Challenged Claims

1. Claim 1: [1PRE] A method comprising:

Sheha discloses methods that enable users of telephone devices, whether landline or wireless, to determine and share their own location with other telephone devices, and to request the locations of other telephone devices. Sheha, Abstract; Williams-Decl., [0103]-[0105]. As demonstrated below, Sheha-Smith-Carey meets all limitations of claim 1. Williams-Decl., [0105].

- Sheha discloses use of a system that employs wireless telephonic devices whose locations can be determined and provided to a remote system. Sheha, Abstract, 10:66-11:9; Williams-Decl., [0106]. A mobile-to-mobile configuration is illustrated in Figure 3, where both mobile devices 18b-18c communicate with the wireless network 22 via their respective wireless connections 20b-20c. Sheha, 11:12-35; Williams-Decl., [0106].



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“[A] plurality of unique users” are “on various devices,” which can be “wireless” “telephone” devices. Sheha, 3:8-10, 4:3-7. Each mobile device has its associated “users’ account information.” Sheha, 11:20-23, 8:25-53. Thus, each one of *a plurality of users is associated to a different one of a plurality of wireless telephonic devices*, as claimed. Williams-Decl., [0107].

Sheha discloses that mobile devices 18b-18c using its system can request and obtain the locations of other mobile devices 18b-18c using its system. Sheha, 10:66-11:51; Williams-Decl., [0106]. Sheha also discloses that a user can dial or otherwise input another mobile device’s telephone number to obtain its location. Sheha, 10:66-11:9, 11:55-12:7; Williams-Decl., [0108].

It was well-known before the ’283 patent’s priority date to allow users to view lists of contacts stored by their wireless devices, by displaying the contacts list on the wireless device. Williams-Decl., [0109]. Smith shows an example of this conventional functionality in FIGs 15A-15B (below). Smith, 5:15-18, 9:42-55; Williams-Decl., [0109]-[0110].

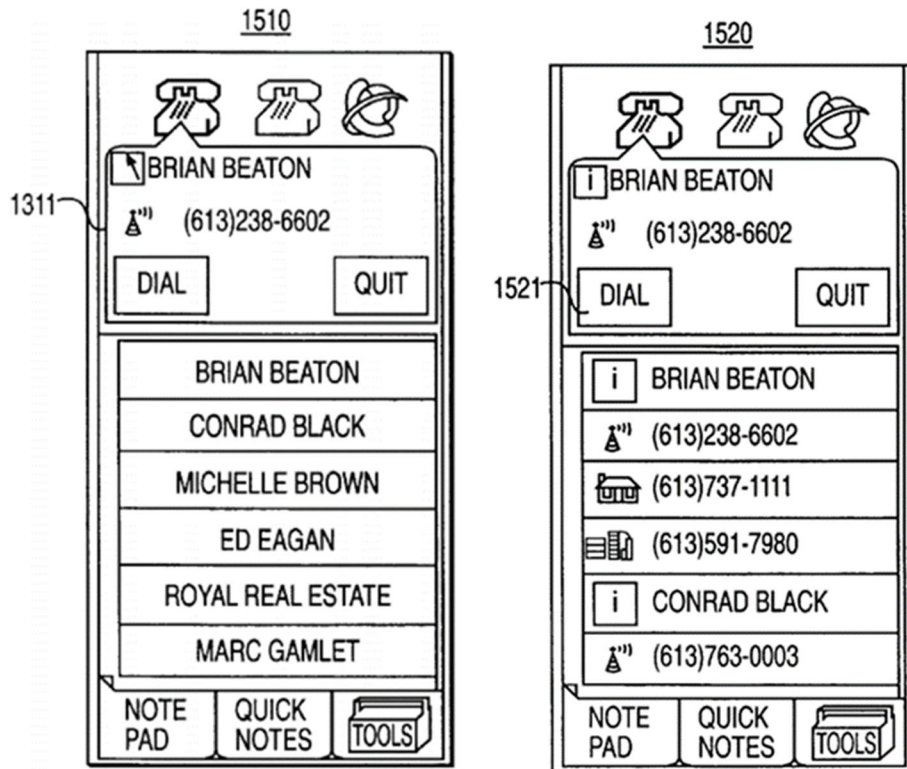


FIG. 15A

FIG. 15B

It would have been obvious to include the standard feature of displaying a contact list into the Sheha wireless devices to enable a user to easily retrieve and select a contact of interest from among multiple saved contacts. Williams-Decl., [0111]; *supra* §VI.D.

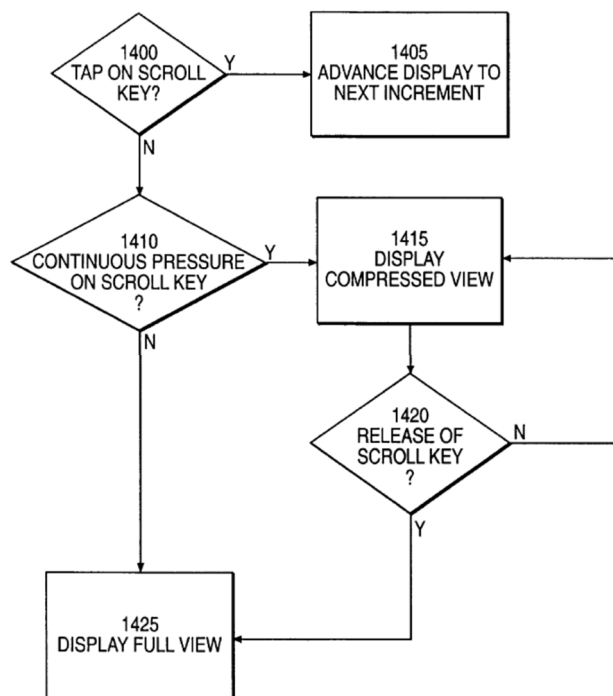
Thus, Sheha-Smith-Carey meets [1A]. Williams-Decl., [0112].

To the extent the *plurality of users* displayed in [1A] must include the *first wireless telephonic device's* user, implementing Sheha-Smith-Carey's contacts list to display an entry for the wireless device's own user in addition to that user's contacts would have been an obvious known design choice. A POSA would have been motivated to display an entry for the wireless device's user to provide the

user a convenient way of accessing the user's own contact information (e.g., when the user needs to remember or share the user's own information), with reasonable expectation of success. Williams-Decl., [0113]-[0117] (citing EX1028 ("Shankar"), FIG. 4, 6:56-7:55, corroborating POSAs' background knowledge in this regard).

b. [1B] receiving on said first wireless telephonic device a first manual input in a form of a selection of one of said plurality of users;

Sheha discloses that its wireless devices allow numeric and alphanumeric input. Sheha, 2:64-3:3; Williams-Decl., [0118]. In addition, Smith discloses that a user may manually scroll through the contact list to identify a specific person to contact. Smith, 9:42-61, 10:67-11:3, FIG. 14; Williams-Decl., [0119]-[0120].



Smith, FIG. 14.

It would have been obvious to include such functionality for the same reasons discussed *supra* §VI.E.1.a with respect to [1A]. Williams-Decl., [0120].

Additionally, it would have been obvious to implement Sheha's wireless device to receive manual input selecting a contact of interest from a displayed contacts list to request that contact's location information. Manually selecting another user from a displayed contacts list was well-known in POSAs' background knowledge as a suitable option with reasonable expectation of success for selecting a contact of interest, including to access their location. Williams-Decl., [0121]-[0125] (citing corroborating EX1027 ("Han"), [0033]; EX1018 ("Meadows"), FIG. 4A, 5:30-47; EX1022 ("Darling"), 41:1-15).

Thus, Sheha-Smith-Carey meets [1B]. Williams-Decl., [0126].

c. [1C] receiving on said first wireless telephonic device an input in a form of a login and a second manual input in a form of a password;

Sheha discloses that "every telephone account user has a username and password for the ODAS 3" and that the ODAS verifies that users are signed on to access various available services using authorization and authentication protocols. Sheha, 7:22-23, 8:25-53, 11:20-23 (ODAS receives "users' account information...for both mobile devices" in mobile-to-mobile embodiment as in landline-to-landline embodiment), 11:55-12:7; Williams-Decl., [0127]. It was conventional before the '283 patent's priority date to manually enter a login and

password using Sheha's numeric or alphanumeric keys, such as disclosed in Carey's FIG. 8 (below) and the corresponding description. Carey, 7:67-8:10; Williams-Decl., [0128].

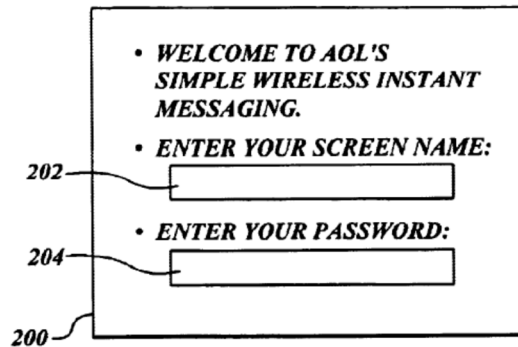


Fig. 8

Moreover, a POSA would have included such functionality to enable a user of Sheha's system to input their username and password. Williams-Decl., [0128]; *Supra* §VI.D.

Thus, Sheha-Smith-Carey meets [1C]. Williams-Decl., [0129].

- d. **[1D] determining whether to allow access of location information for said one of said plurality of wireless telephonic devices associated to said selected one of said plurality of users,**

Sheha states that “[w]hen a mobile device’s position information is requested, the system, based on privacy settings, responds with the appropriate position information to the requesting user’s device.” Sheha, 12:1-7. For example, Sheha discloses that permissions can be established by the mobile devices’ privacy information including “a group database and authorization and authentication

protocols” by which a user “can define a group of specific users that have access to” the user’s location information. Sheha, 11:55-12:7, 4:59-5:20; *see also* 13:65-14:2, 14:54-61, 19:9-13; Williams-Decl., [0130]-[0131]. The ODAS uses this privacy information to determine whether the target device has authorized the requesting device to obtain its location information. Sheha, 3:4-14, 3:22-28, 4:8-18, 5:21-46, 8:42-53, 9:59-10:4; Williams-Decl., [0131].

In IPR2023-00091 (Paper 13 at 31; Paper 7 at 32), Mullen argued that Sheha’s description of “defin[ing] a group of specific users that have access” does not apply to mobile devices or does not apply without initiating a phone call. *See* IPR2023-00091, Paper 7 at 9-15, 50 (arguing that Sheha discloses four “discrete” embodiments: landline-to-landline phone calls, landline-to-mobile phone calls, mobile-to-mobile phone calls, and no phone calls). Mullen is incorrect. As the Board recognized for institution purposes, Sheha discloses that the mobile, no-call embodiment may employ “authorization and authentication protocols...similarly to” the landline embodiment. Sheha, 12:4-7; *see* IPR2023-00091, Paper 9 at 21. This is further corroborated by Sheha’s claims which recite “determining whether the first user is a member of the authorized user group” as part of “accessing privacy information” for the location of a “mobile telephone.” Sheha, 18:47-19:46. Williams-Decl., [0132]-[0134].

Alternatively, even if Sheha did not explicitly disclose using the group database in mobile-to-mobile no-call embodiments, doing so would have been an obvious variation because allowing a mobile user to specify a group of other mobile users to have access to the user's location (or to provide access on an individual-user basis) without initiating a phone call was well-known as a beneficial option with reasonable expectation of success in a system like Sheha's. Williams-Decl., [0135]-[0138] (citing corroborating EX1016 ("Sandhu"), [0024]; EX1007 ("Randall"), [0052], [0070], [0136], [0144]-[0148]).

Thus, Sheha-Smith-Carey meets [1D]. Williams-Decl., [0139].

- e. **[1E] wherein said determination includes identifying said user of said first wireless telephonic device from said plurality of users using said login and determining said password is associated with said login and**

As discussed *supra* §VI.E.1.c ([1C]), Sheha discloses that users provide their username and password as a part of Sheha's authorization and authentication protocols to confirm their identity and that "using the authorization and authentication protocols a user can request the position of a mobile device." Sheha, 8:40-53, 12:1-7; Williams-Decl., [0140]; *see also supra* §VI.E.1.d ([1D]). "[E]very telephone account user has a username and password" from which the ODAS determines which "particular user is signed-on to the system" and whether the "user is genuine." Sheha, 8:40-53. Thus, the *determination includes*

identifying said user...from said plurality of users using said login and determining said password is associated with said login as claimed. Williams-Decl., [0140].

Sheha also discloses that the “authentication and authorization protocols” use the username and password to “verify the level of authority [that particular] user is granted, such as for differentiating services provided by the ODAS.” Sheha, 8:40-50. This includes the ODAS determining whether that user has permission to obtain the location of a requested device. Sheha, 5:21-46, 11:63-12:7; Williams-Decl., [0140].

In IPR2023-00091 (Paper 7 at 22-26), Mullen argued that Element [1E] does not encompass “verifying user identity *at the time of sign-in*” (emphasis original). As the Board found for institution purposes, Mullen’s argument fails because there is no such “temporal restriction” in the claim, and “Sheha’s ODAS employs authentication and authorization protocols as part of the process of ensuring a user that requests the location of another user has the appropriate permissions to access the location information.” IPR2023-00091, Paper 9 at 20. Williams-Decl., [0141].

Thus, Sheha-Smith-Carey meets [1E]. Williams-Decl., [0142].

f. [1F] determining whether said selected one of said plurality of users has provided access rights for said location information to said user of said first wireless telephonic device,

As discussed *supra* §VI.E.1.d ([1D]), Sheha’s “users can define a group of specific users that have access to” the location of the user who defined the group; this is “accomplished by utilizing a group database and authorization and authentication protocols to identify users that are permitted to access this information.” Sheha, 11:63-12:1. “When a mobile device’s position information is requested, the system” can use these “authorization and authentication protocols” to determine whether to “respond[] with the appropriate position information to the requesting user’s device.” Sheha, 12:1-7; *see also* Sheha, 3:4-14, 3:22-25, 4:8-18, 4:58-5:46; Williams-Decl., [0143]-[0144].

In IPR2023-00091 (Paper 13 at 35), Mullen argued that “Sheha does not disclose one device user assigning rights exclusively to another device user.” Mullen argued that claim 1 (and “similarly” claims 8 and 15) requires the “*access rights*” provided to the “*user of said first wireless telephonic device*” to be “exclusive to that device” (*id.* at 3-6), but that is not what the claims recite. Claim 1 nowhere recites “exclusively” or anything similar, and does not exclude the “*access rights for said location information*” from being provided to other devices as well. Mullen’s specification arguments (*id.* at 6-10) also fail, because they improperly attempt to import limitations from a specification embodiment into

claims that do not recite those limitations. The Federal Circuit has “repeatedly warned against confining the claims to those embodiments” in the specification, even if it “describes only a single embodiment.” *Phillips v. AWH Corp.*, 415 F.3d 1303, 1323 (Fed. Cir. 2005) (*en banc*). Further, the ’283 patent itself explicitly states that “a user may organize his/her user list into groups and assign access rights to that group,” just as Sheha does. EX1001, 12:55-58, 3:22-24. Williams-Decl., [0145].

Alternatively, even if claim 1 required providing access rights to an individual user, Sheha renders this obvious because POSAs knew that “defin[ing] a group” (Sheha, 11:63-65) can include defining a group having only one member, even if other defined groups have multiple members. Williams-Decl., [0146]. Alternatively, allowing a user to specify access rights for individuals in addition to groups would have been an obvious variation because doing so was well-known as a beneficial option with reasonable expectation of success in a system like Sheha’s. Williams-Decl., [0147]-[0149] (citing corroborating EX1007 (“Randall”), [0052], [0070], [0136], [0144]-[0146]; EX1015 (“Friedman”), 12:60-13:21).

Mullen also argued in IPR2023-00091 (Paper 13 at 23-24) that only the target mobile device in Sheha, and not the ODAS, determines whether the requesting user has access rights to the target’s location, because the ODAS “transmits [the] request to [the] target mobile device[] [and] receives the device’s

response.” Mullen’s argument fails for either of two reasons. First, claim 1 does not require [1F] to be performed entirely by the server. Indeed, the ’283 patent’s specification says determining the requesting device’s access rights can be performed “as a direct call to the requested device/user” (EX1001, 11:45-52), just as Mullen said Sheha does. Second, Mullen’s characterization of Sheha is incorrect. Sheha teaches embodiments that Mullen ignored, where the ODAS implements the “authorization and authentication protocols” and the “group database” described in 11:63-12:7 for determining whether the requesting user has access rights. *See* Sheha, 3:4-14 (“networked server system utilizing authentication and authorization procedures”), 4:8-18 (“online database and/or networked authentication and authorization connection server”), 7:22-23 (“online **database** and application server (ODAS)”),² 8:42-53 (“ODAS 3 us[es] authentication and authorization protocols” to “verify the level of authority each user is granted”), 9:61-10:4; Williams-Decl., [0150]. Alternatively, implementing the group database and its utilization at the server would have been an obvious variation because doing so was well-known as a beneficial option with reasonable expectation of success in a system like Sheha’s. Williams-Decl., [0151]-[0154] (citing corroborating EX1016 (“Sandhu”), [0023]-[0029]; EX1007 (“Randall”), [0511]-[0514]; EX1015 (“Friedman”), 12:60-13:21).

² All emphases herein are added unless otherwise specified.

Thus, Sheha-Smith-Carey meets [1F]. Williams-Decl., [0155].

- g. [1G] and said first wireless telephonic device is operable to assign location access rights to said one of said plurality of wireless telephonic devices associated with said selected one of said plurality of users for obtaining a location of said first wireless telephonic device;**

Sheha discloses that any of its mobile devices can provide permission to another mobile device to request its location. Williams-Decl., [0156]. For example, Sheha describes that each device can establish privacy settings that control which other devices may access the device's location, and that the device's user can configure these settings. Sheha, 5:38-46, 10:17-26, claim 47; Williams-Decl., [0156]. Sheha also discloses that configuring a device's privacy permissions can include "defin[ing] a group of specific users that have access" to the device's location. Sheha, 11:63-12:7; *see also id.*, 13:57-14:61, 18:47-19:46 (corroborating that "privacy information" includes information "identifying an authorized user group" that is "pre-defined" by a "mobile telephone" user). Thus, a mobile device whose position is requested can provide permission for a requesting device to access its location information, and the requesting device can also establish permissions for other devices to access its location. Sheha, 5:3-9, 11:10-54, 11:55-12:7; Williams-Decl., [0156]-[0157].

As discussed *supra* §VI.E.1.f ([1F]), claim 1 does not require assigning rights exclusively to a single individual device or user; and even if claim 1 required

assigning access rights to an individual device/user, Sheha renders this obvious because POSAs knew that “defin[ing] a group” (Sheha, 11:63-65) can include defining a group having only one member and, alternatively, allowing a user to assign access rights to individuals would have been an obvious variation. Williams-Decl., [0158].

Therefore, Sheha-Smith-Carey meets [1G]. Williams-Decl., [0159].

h. [1H] transmitting said location information from a server to said first wireless telephonic device;

Sheha discloses that the ODAS (“online database and application *server*”) receives location information from a target wireless device and provides that location information to the requesting wireless device. Sheha, 10:66-12:7, FIG. 3 (annotated below); Williams-Decl., [0160].

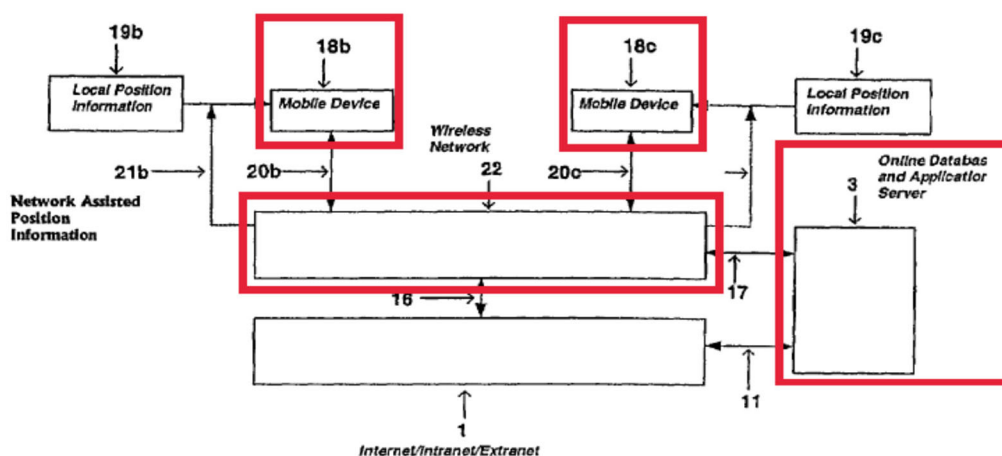


FIG. 3

Thus, Sheha-Smith-Carey meets [1H]. Williams-Decl., [0161].

- i. [11] and displaying said location information on said first wireless device.

Sheha discloses transferring position information for one device to another in the form of a map. Sheha, 4:22-26; Williams-Decl., [0162]. Further, Sheha discloses devices with displays to provide maps showing the locations of the target wireless device and the requesting wireless device. Sheha, 9:23-39, FIG. 5 (labels 33 and 34, annotated below); Williams-Decl., [0162].

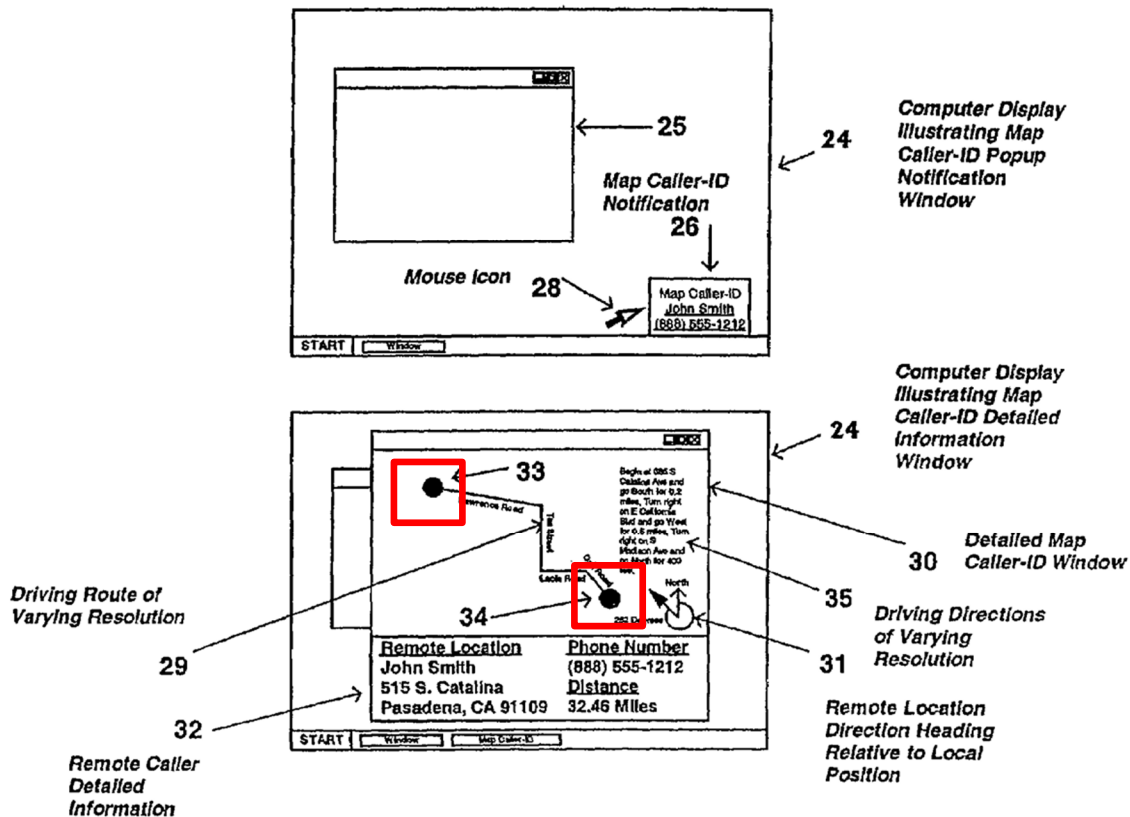


FIG. 5

Further, Sheha discloses that such information “can be displayed on the mobile telephone.” Sheha, 4:52-58; Williams-Decl., [0163]. While Figure 5 and 4:43-58 are presented in the context of examples involving a landline, they equally apply in the mobile-to-mobile context, which Sheha explains is “similar to a landline-to-mobile application.” Sheha, 4:59-5:11, 4:13-18, 4:52-58, 11:36-12:7; Williams-Decl., [0163]. Further, Sheha discloses that both the requesting and the target mobile device can display maps showing the locations of both devices. Sheha, 4:52-58, 11:10-51; Williams-Decl., [0163].

Thus, Sheha-Smith-Carey meets [1I]. Williams-Decl., [0164].

2. Claim 2: wherein a positioning system is utilized to provide said location information.

Sheha discloses that wireless devices can include positioning systems, such as GPS (“Global *Positioning System*”), to determine their locations. Sheha, 1:35-38, 10:5-16; Williams-Decl., [0165]. Sheha also discloses that the locations of wireless devices may be determined using network-assisted location techniques. Sheha, 10:5-16; Williams-Decl., [0165].

Thus, Sheha-Smith-Carey meets claim 2. Williams-Decl., [0166].

3. **Claim 6: further comprising receiving a third manual input, wherein said first wireless telephonic device assigned location access rights to said one of said plurality of wireless telephonic devices associated with said selected one of said plurality of users for obtaining a location of said first wireless telephonic device and said third manual input modifies said location access rights.**

Sheha teaches that a mobile device can “terminate” the location access of another mobile device “abruptly due to *manual intervention*” (i.e., a third manual input), which meets claim 6. Sheha, 5:14-15, 5:34-38; Williams-Decl., [0167].

Additionally, as discussed *supra* §§VI.E.1.d-VI.E.1.f with respect to [1D]-[1F], Sheha discloses that users may identify authorized users to the Sheha system. Williams-Decl., [0168]. As discussed *supra* §VI.E.1.a with respect to [1A], it would have been obvious to use conventional contact list functionality, such as shown in Smith. Williams-Decl., [0169]; Smith, 5:15-18, 9:42-55, FIGs. 15A-15B. Smith discloses that a user may manually modify contact information for other users, such as to add phone numbers, email addresses, or other information. Smith, 10:7-16, 6:53-61; Williams-Decl., [0169]. Sheha allows a user to specify which users are authorized to obtain permission information, and it would have been obvious to do this by interacting with a contact list like Smith’s. Sheha, 4:58-5:20; 11:55-12:7; Williams-Decl., [0169]. It would have been obvious to allow a user to modify which users are able to access its location using the numeric or alphanumeric buttons on the Sheha mobile device to ensure that the user has

control over their privacy permissions. Sheha, 2:64-3:3, 5:14-38; Williams-Decl., [0169]; *supra* §VI.D. Further, it would have been obvious to provide such functionality after selecting a user in a contact list. Williams-Decl., [0169]; *supra* §VI.D. The contact list is where aggregated information about other users is accessed, which a POSA would expect to also include privacy permissions establishing whether a particular user can access location information. Williams-Decl., [0169]; *supra* §VI.D.

Thus, Sheha-Smith-Carey meets claim 6. Williams-Decl., [0170].

4. Claim 7: wherein a triangulation process is utilized to provide said location information.

As discussed *supra* §VI.E.2 (claim 2), Sheha uses GPS *to provide said location information*. POSAs knew that GPS uses *a triangulation process*. Williams-Decl., [0171]-[0175] (citing corroborating EX1016 (“Sandhu”), [0004], [0020]; EX1019 (“Thomas”), 3:26-29; EX1020 (“Murphy”), 1:9-13; EX1021 (“Divakaruni”), 1:29-59). The ’283 patent’s only mention of “triangulation” admits that it was “background” knowledge that GPS uses it. EX1001, 1:14-27; Williams-Decl., [0171].

Alternatively, Sheha’s mobile devices may use “network-assisted position information” such as “Time-Of-Arrival (TOA) algorithm techniques” (Sheha, 10:5-16), and it was a well-known, obvious design choice to use those or another type of *triangulation process* as an alternative to GPS to provide the *location*

information Sheha provides. Williams-Decl., [0176]-[0179] (citing corroborating EX1034 (“Enzmann”), 1:30-40, 2:16-41, 3:1-16, 4:25-38, 5:13-20; EX1035 (“Degnbol”), 5:7-11, 27:18-19, 31:1-2).

5. Claim 8:

Sheha-Smith-Carey meets the following elements of claim 8 for the reasons discussed in the corresponding section above. Williams-Decl., [0180]-[0191].

Element	Addressed in Section:
[8PRE]	VI.E.1 ([1PRE])
[8A]	VI.E.1.a ([1A])
[8B]	VI.E.1.b ([1B])
[8C]	VI.E.1.c ([1C])
[8D]	VI.E.1.d ([1D]), VI.E.1.h ([1H])
[8E]	VI.E.1.e ([1E])
[8F]	VI.E.1.f ([1F])
[8H]	VI.E.1.g ([1G])
[8I]	VI.E.1.h ([1H])
[8J]	VI.E.1.i ([1I])

As to Element [8G], Sheha’s ODAS (“*said server*”) is located remotely across network 22 from the wireless devices 18b-18c. Sheha, FIG. 3; Williams-Decl., [0188].

Sheha-Smith-Carey thus meets all limitations of claim 8. Williams-Decl., [0180].

6. Claim 9: wherein a positioning system is utilized to provide said location information.

Sheha-Smith-Carey renders claim 9 obvious for the same reasons as claim 2. *Supra* §VI.E.2; Williams-Decl., [0192].

7. Claim 13: further comprising receiving a third manual input, wherein said wireless device assigned location access rights to said first wireless telephonic device for obtaining a location of said wireless device and said third manual input modifies said location access rights.

Sheha-Smith-Carey renders claim 13 obvious for the same reasons as claim 6. *Supra* §VI.E.3; Williams-Decl., [0193].

8. Claim 15

a. [15PRE]-[15A], [15C]-[15E]

[15PRE]-[15A] are met for the reasons discussed *supra* §VI.E.1 ([1PRE]), §§VI.E.1.a-VI.E.1.b ([1A]-[1B]), and elements [15C]-[15E] are met for the reasons discussed *supra* §§VI.E.1.c-VI.E.1.h ([1C]-[1H]). Williams-Decl., [0194]-[0201].

b. [15B] locating said second wireless device;

Sheha discloses a system that employs wireless devices whose locations can be determined and provided to a remote system. Sheha, Abstract, 10:66-11:9; Williams-Decl., [0196]. A mobile-to-mobile configuration is illustrated in Figure 3, where both mobile devices 18b-18c communicate with the wireless network 22

via their respective wireless connections 20b-20c. Moreover, both devices determine and provide their locations to the ODAS, or Sheha can use network-assisted location techniques to locate the devices. Sheha, 10:5-16, 10:66-11:51; Williams-Decl., [0197].

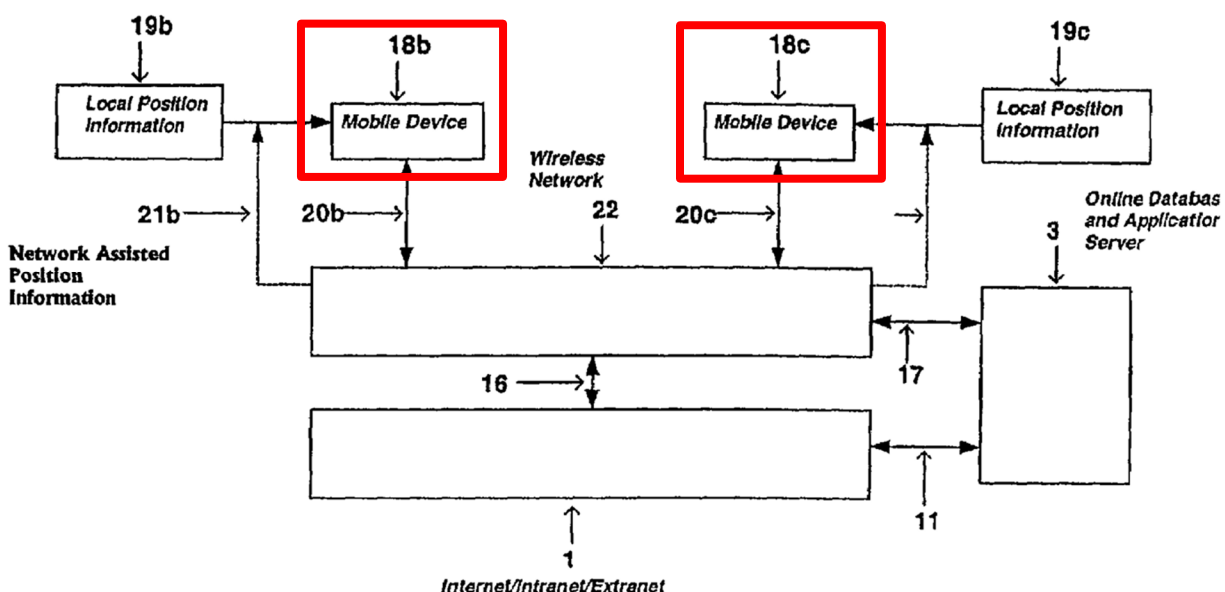


FIG. 3

Sheha, FIG. 3 (annotated).

Thus, Sheha-Smith-Carey meets [15B]. Williams-Decl., [0198].

- c. **[15F] displaying a map on said first wireless device with a marker representative of the location of said second wireless device.**

See supra §VI.E.1.i ([11]). Sheha discloses displaying “a map and address of the destination telephone number...on the mobile telephone,” and teaches that

such a map can include a marker representative of the location of the tracked wireless device, such as shown in Figure 5. Sheha, 4:52-58, 6:51-56, 9:23-39 (map displays “map location 33 of the caller” and “map location 34 of the destination telephone number”), FIG. 5 (annotated below, markers representing locations 33 and 34 of both devices); Williams-Decl., [0202].

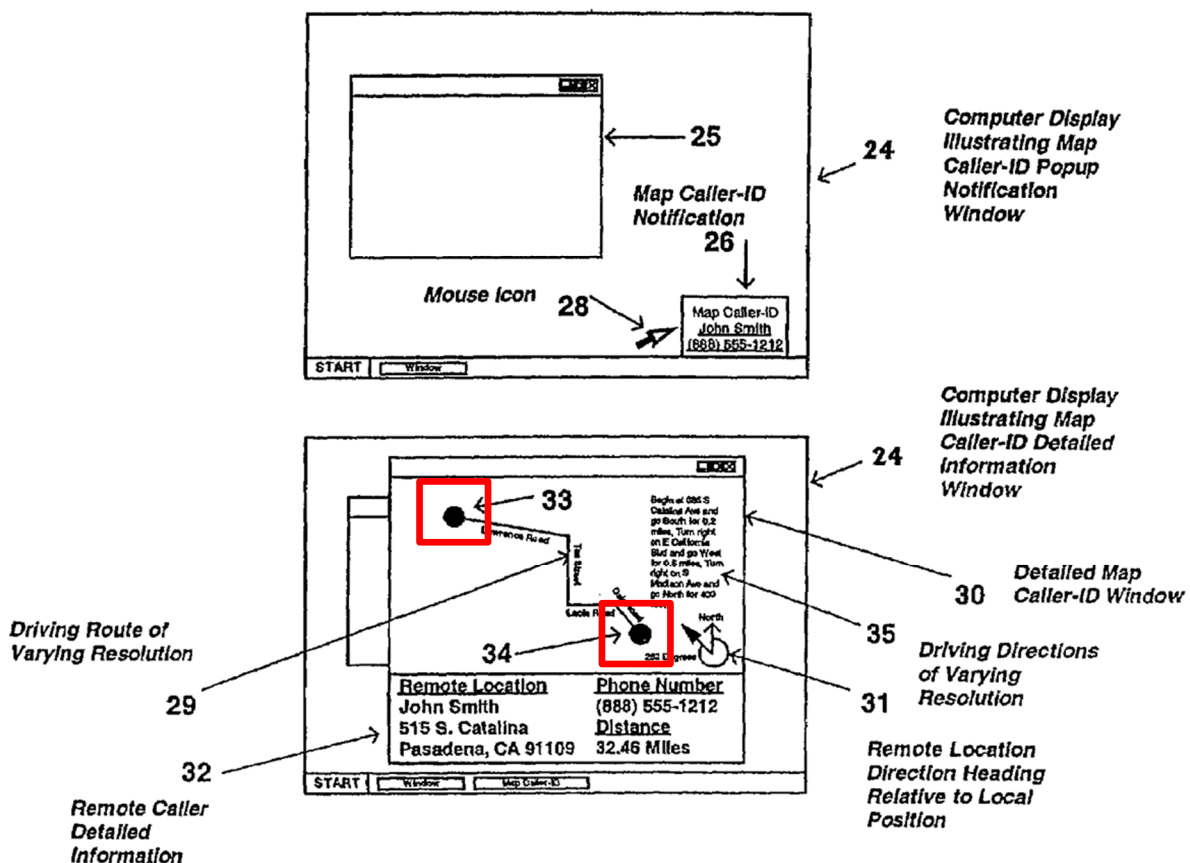


FIG. 5

In IPR2023-00091 (Paper 13 at 42-45), Mullen argued that Sheha’s “map” displayed “on the mobile telephone” at 4:52-58 is not “a graphical map” like FIG. 5 and cannot be received without a phone call. These assertions are wrong. FIG. 5 is the only type of “map and address” (Sheha, 4:52-58) display illustrated in Sheha, and nothing in Sheha suggests that the “map” discussed at 4:52-58 would be anything other than graphical. Williams-Decl., [0203]. While Sheha (12:8-41) explains that *some* embodiments use an “accompanying device” that “is better suited for navigational displays and computations” than a “typical mobile navigational device” which may be “not optimal for navigational purposes,” *other* embodiments can still display the “map...on the mobile telephone” as discussed at 4:52-58. Williams-Decl., [0203]. And Sheha teaches that the no-call embodiment only differs from the phone-call embodiment in how the device “request[s] position information” (Sheha, 11:55-12:7), not in how that information is displayed. Williams-Decl., [0203].

Alternatively, even if Sheha did not itself expressly acknowledge it, implementing Sheha to display a map on the requesting wireless device with a marker representative of the location of the target wireless device would have been an obvious variation in view of POSAs’ background knowledge of the convenient option and reasonable expectation of success in doing so. Williams-Decl., [0204]-[0210] (citing corroborating EX1007 (“Randall”), [0021], p. 85; EX1016

(“Sandhu”), [0027]; EX1014 (“Wollrab”), FIGs. 1-4C; EX1017 (“Grube”), FIG. 2, 4:38-57, 5:13-17, 6:14-27, 6:59-7:6); EX1018 (“Meadows”), 2:2-7, 3:59-67, 5:48-57, FIG. 4B).

Thus, [15F] is obvious for the reasons discussed *supra* §VI.E.1.i with respect to [1I] and the reasons discussed in this section above. Williams-Decl., [0211].

9. Claim 16: wherein a positioning system is utilized to provide said location information.

Sheha-Smith-Carey renders claim 16 obvious for the same reasons as claim 2. *Supra* §VI.E.2; Williams-Decl., [0212].

10. Claim 17: wherein said password is received on a first display screen.

As discussed *supra* §VI.E.1.c ([1C]), Sheha discloses that “every telephone account user has a username and password for the ODAS 3” and that the ODAS verifies that users are signed on to access various available services using authorization and authentication protocols. Sheha, 8:40-53; *see also* 11:55-12:7. It was conventional before the priority date of the ’283 patent to manually enter a login and password, such as shown in Carey, FIG. 8 (below) and the corresponding description. Carey, 7:67-8:10; Williams-Decl., [0213].

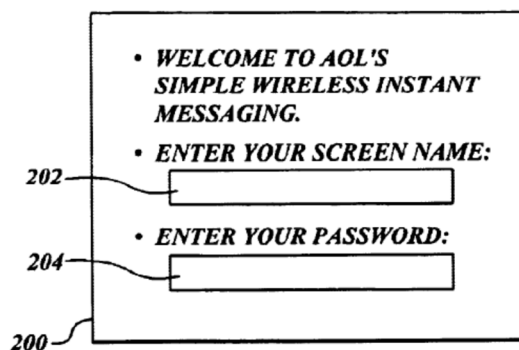


Fig. 8

As illustrated above, Carey's password is received on a first display screen. Carey, FIG. 8; Williams-Decl., [0214].

A POSA would have included such functionality to enable a user of Sheha's system to input their username and password. Williams-Decl., [0214]; *supra* §VI.D.

Thus, Sheha-Smith-Carey meets claim 17. Williams-Decl., [0215].

VII. GROUND 2: CLAIMS 3-5, 10-12, 14, 19-20 ARE UNPATENTABLE OVER SHEHA+SMITH+CAREY+WAKO

A. Wako (EX1025)

Wako discloses a vehicle navigation system that provides turn-by-turn directions to an identified destination. Wako, Abstract. Wako allows a user to select a desired destination in a variety of ways, such as by selecting predetermined points of interest or addresses saved in an address book. Wako, 10:28-13:14, FIGs. 10-12. Wako illustrates conventional user interface screens desirable in a navigation system for receiving the user's selections, processing to obtain the

requested information, and displaying maps, routes, and other useful navigation information. Wako, FIGs. 5-12. Williams-Decl., [0218].

B. Sheha-Smith-Carey-Wako Combination

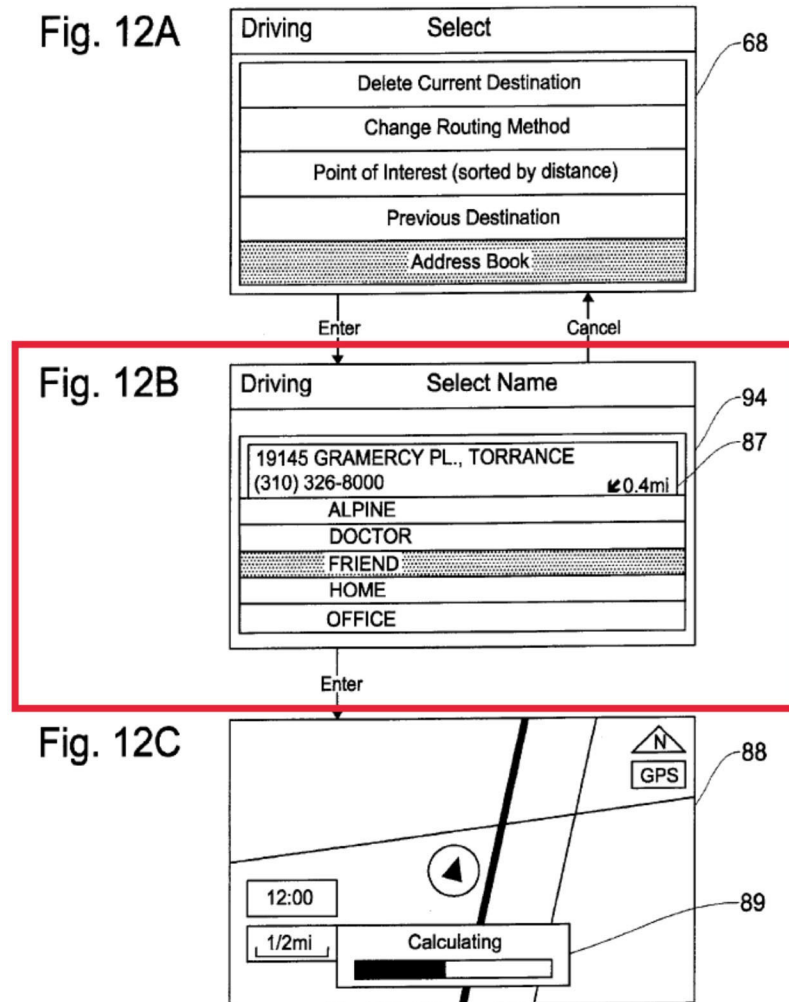
Sheha teaches using a wireless telephone to obtain “driving directions” while traveling in a vehicle, which are navigation capabilities described in Wako. Sheha, 3:29-49; Williams-Decl., [0218]-[0219]. Thus, Sheha motivates looking to navigation systems like Wako’s, which teach graphical user interface features that a user would have expected, to allow for interacting with such a navigational system. Williams-Decl., [0219]-[0220]. A POSA would have had reasonable expectation of success given Sheha’s explicit teachings to provide navigation system functionality. Williams-Decl., [0220].

C. Mapping to Challenged Claims

- 1. Claims 3, 10, 19: wherein said [manual] selection occurs on a first display screen and a second display screen is provided on said [first] wireless [telephonic] device during said determination.**

As discussed *supra* §VI.E.1.a ([1A]), Smith provides an example of a conventional contact list where a user may select a contact, which is provided in a first display screen. Smith, FIG. 15A; Williams-Decl., [0221]-[0222]. In addition, it was routine before the priority date of the ’283 patent to provide a display for a user to indicate that a request has been submitted and is being processed. Williams-Decl., [0222].

For example, Wako illustrates a navigation system that allows a user to select a friend and obtain driving directions to the friend's address. Wako, FIG. 12B; Williams-Decl., [0223]-[0224].



Wako, FIGs. 12A-C (annotated).

After making the selection, the navigation system outputs a display screen indicating that a route is being calculated, which is a display screen informing the user that a location is being accessed. Wako, FIG. 12C; Williams-Decl., [0225].

Fig. 12A

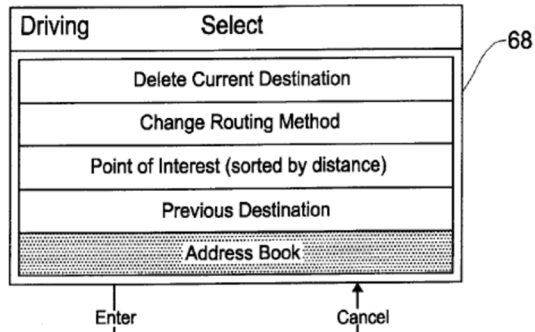


Fig. 12B

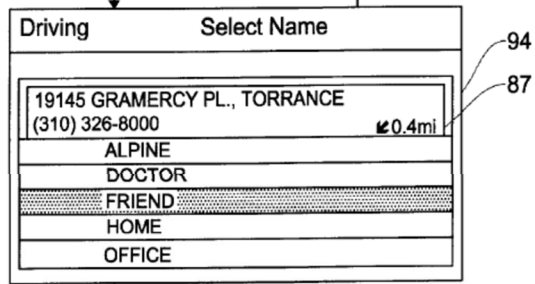
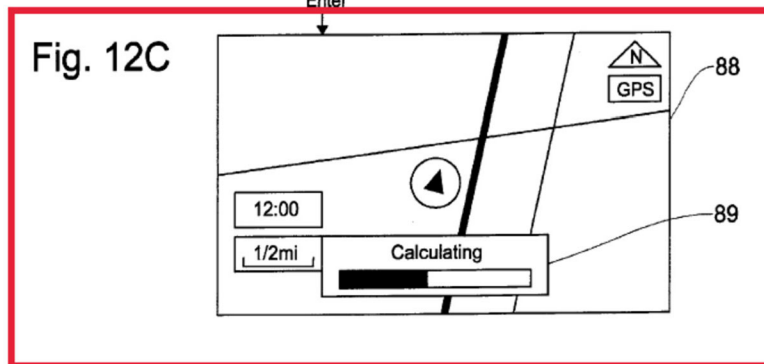


Fig. 12C



Wako, FIGs. 12A-C (annotated).

POSAs would have had motivation and reasonable expectation of success to provide a similar *second display screen* (which POSAs would have understood could just as easily display “Processing” or “Working” as “Calculating”), such as described by Wako, *during said determination* of whether the selected friend’s location is accessible—e.g., to let the requesting user know that progress is being

made and help avoid user impatience. Williams-Decl., [0226] (citing corroborating EX1033 (“Hoffman”), 21:58-61); *Supra* §VII.B.

Thus, Sheha-Smith-Carey-Wako meets claims 3, 10, and 19, which include only minor variations in claim language (noted in the heading above), and are obvious for the same reasons. Williams-Decl., [0227], [0235], [0242].

2. Claims 4, 11, 20: wherein said [manual] selection occurs on a first display screen, a second display screen is provided on said [first] wireless [telephonic] device during said determination, and a third display screen is provided on said [first] wireless device after said location information is transmitted to said [first] wireless [telephonic] device.

Claim 4 recites the same limitations as claim 3, but adds “*a third display screen...after said location information is transmitted....*” For the reasons discussed *supra* §VII.C.1 (claim 3), Sheha-Smith-Carey-Wako meets those repeated portions of claim 4. Further, and as discussed *supra* §VI.E.1.i ([11]), Sheha discloses displaying the received location information. Sheha, 4:22-26, 4:52-58, 9:23-39, FIG. 5 (labels 33 and 34). Displaying the received location, which occurs after the location information is transmitted to the wireless telephonic device, meets the claimed *third display screen*. Sheha, 4:52-58; Williams-Decl., [0228]. It would have been obvious to implement Sheha to provide such display screens to provide the typical notification to the user that a request is being processed and then to provide the requested information. Williams-Decl., [0229]; *supra* §VII.B.

Claims 11 and 20 include only minor variations on claim 4's language (noted in the heading above), and are obvious for the same reasons. Williams-Decl., [0236], [0243].

Thus, Sheha-Smith-Carey-Wako meets claims 4, 11, and 20. Williams-Decl., [0230], [0236], [0243].

3. **Claims 5, 12: wherein said selection occurs on a first display screen, a second display screen is provided on said [first] wireless [telephonic] device during said determination, a third display screen is provided on said [first] wireless device after said location information is transmitted to said [first] wireless [telephonic] device, and a fourth display screen is provided that includes an option to obtain directions from said [first] wireless [telephonic] device to said [one of said plurality of wireless telephonic devices associated to said selected one of said plurality of users] / [first wireless telephonic device].**

Claim 5 recites the same limitations as claim 4, but adds “*a fourth display screen...that includes an option to obtain directions....*” For the reasons discussed *supra* §VII.C.2 (claim 4), Sheha-Smith-Carey-Wako meets those repeated portions of claim 5. In addition, Sheha describes providing a map or a driving route to the received location, such as after a user selects an option to view more detailed information about a user's location. Sheha, 3:29-36, 4:52-58, 9:10-16, 9:23-39; Williams-Decl., [0231]. Moreover, a user would expect an option to obtain a route to a location by interacting with a further display screen after receiving a location, such as disclosed in Wako. Wako, FIGs. 12B-C, 12:35-13:37; Sheha, 9:10-16,

9:23-39, 13:32-44; Williams-Decl., [0232]-[0233]. Wako further teaches to “include[] an information box 78 which shows a distance to the final destination and an anticipated time to reach the final destination” in “the route guidance screen 76 in FIG. 7.” Wako, 9:8-22. A POSA would have been motivated to combine the teachings of Sheha with those of Wako to allow the user to use the received location for navigation and to estimate both distances to another device and times of arrival. Williams-Decl., [0232]; *supra* §VII.B.

Claims 12 includes only minor variations on claim 5’s language (noted in the heading above), and is obvious for at least the same reasons. Williams-Decl., [0237].

Therefore, Sheha-Smith-Carey-Wako meets claims 5 and 12. Williams-Decl., [0234], [0237].

4. **Claim 14: [Claim 3], further comprising receiving a third manual input, wherein said wireless device assigned location access rights to said first wireless telephonic device for obtaining a location of said wireless device, said third manual input modifies said location access rights, and determining a travel time between said wireless device and said first wireless telephonic device.**

Claim 14 recites the same limitations as claim 13, but adds “*determining a travel time....*” Sheha discloses determining and displaying a distance to the target wireless device. Sheha, FIG. 5 (annotated below); Williams-Decl., [0238]-[0239].

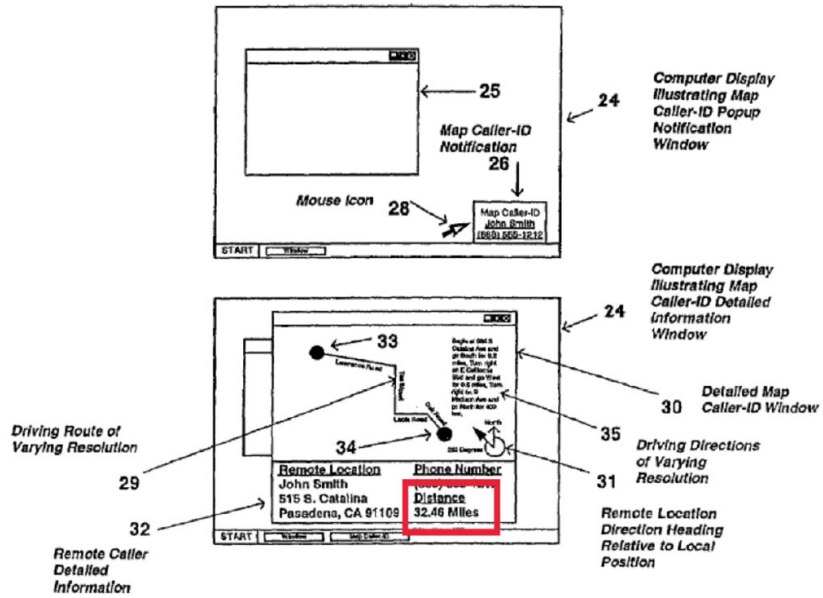


FIG. 5

Travel time was known to be an important piece of navigational information that a user of Sheha's system would have expected to see when reviewing driving directions to a destination. Williams-Decl., [0240]. Wako describes determining an estimated time to reach a destination along a determined route because it discloses determining a route that takes the shortest travel time. Wako, 11:56-60; Williams-Decl., [0241]. It would have been obvious to a POSA to modify the Sheha system to determine travel times as a part of determining routes and driving directions. Williams-Decl., [0241]; *supra* §VII.B.

VIII. GROUND 3: CLAIM 18 IS UNPATENTABLE OVER SHEHA+SMITH+CAREY+ENGBERG

A. Engberg (EX1026)

Engberg describes an authentication system where a user enters access credentials to access protected information. The user enters a user ID and password, including a secret token transmitted to the user's personal communication device. Engberg, Abstract, FIGs. 2A-2D. Williams-Decl., [0246].

B. Sheha-Smith-Carey-Engberg Combination

Sheha describes that a user provides a username and password to a server when requesting location information. *Supra* §VI.E.1. Engberg illustrates different known options for techniques for requesting such information, including requesting both user ID and password on a single display screen or on successive display screens. Engberg, 4:52-65 (describing Figure 2A as showing a screen that is “similar or identical to standard login screens”), FIGs. 2A-2D; Williams-Decl., [0246]-[0248]. A POSA would have been motivated to use separate screens as a design choice for obtaining login and password information from a user, and would have had reasonable expectation of success because such information is already obtained by Sheha's system and Engberg corroborates that separate-screen approaches are similar to “standard login screens.” Engberg, 4:52-65, FIGs. 2A-2D; Williams-Decl., [0248]. Doing so would have been merely simple substitution

of one known element for another with predictable results. *KSR v. Teleflex*, 550 U.S. 398, 416-18 (2007); Williams-Decl., [0248].

C. Claim 18: wherein said password is received on a first display screen and said login is received on a second display screen.

While Carey illustrates a login and password obtained on the same display screen, obtaining each on a different screen was a design choice well known to a POSA, e.g., if a device has limited screen space, or to ensure that a valid username is entered first, or to protect against shoulder surfing. Williams-Decl., [0249]-[0250]. Further, Engberg discloses receiving a login on a first display screen and a password on a second display screen. Engberg, FIGs. 2C-2D; Williams-Decl., [0250]-[0251]. While claim 18 recites the words “*first*” and “*second*,” no ordering of the display screens is required by the claim. Williams-Decl., [0249].

Thus, Sheha-Smith-Carey-Engberg meets claim 18. Williams-Decl., [0252].

IX. GROUND 4: CLAIMS 1-2, 6-9, 13, 15-17 ARE UNPATENTABLE OVER RANDALL

A. Randall (EX1007)

Randall is an international (PCT) application filed August 22, 2001, and published in the international stage as EX1008 (in English, designating the United States) and in the U.S. national stage as EX1007. Randall is thus prior art under pre-AIA 35 U.S.C. §102(e). Citations herein are to the U.S. publication (EX1007); the identical description is present in the international publication (EX1008).

Williams-Decl., [0081]-[0083] (mapping paragraph numbers of EX1007 to page numbers of EX1008).

Randall relates to “enabling a wireless information device to access data services,” using “an extensible framework which handles data passing to and from several applications resident on the device, the framework being shared by each of the applications.” Randall, [0002], [0006]. The wireless devices can be “radio telephones, smart phones,” etc., which “can access information on” “internet servers hosting extensible databases.” Randall, [0002], [0029]. Examples of applications on a wireless device that can all access the same server-based database framework and coordinate to provide services include “a directory application (which contains a user’s contacts list...)” and “a location application (which gives a user’s location and includes digital maps).” Randall, [0009], [0012], [0025], [0028] (“applications...share information”), [0080]-[0081], [0086], [0085]-[0115]; Williams-Decl., [0254]-[0256].

“As an example,...a user might choose to subscribe to a service which allowed others to track his or her location—location could be a new attribute” stored in the “database” as “information relating to [the] individual.” Randall, [0021]. “The user’s friends or parents etc who wish to track the user[’]s location...could add a ‘map’ application to their own devices, which could show their position on digital maps and also, by using the location attribute of the user’s

data object, it could also show the position of the user.” Randall, [0021]. In this example, the “personal information...and location based information” is “handled by contacts...and map type applications” coordinating together to provide the service. Randall, [0021]-[0022], [0025]; Williams-Decl., [0257]-[0260].

Randall’s system further provides “[a]ccess control...which allows a user to define which entities have read/write access to any given field in a database of information relevant to that entity.” Randall, [0066]. One such field in a user’s database is their device’s “GPS location.” Randall, [0505], Table 1; Williams-Decl., [0261]-[0262]. When a wireless user Bob requests access to such data belonging to a user Alice, “the server recognis[es] Bob’s device” via “ID number” and “PIN” or other password, “and determin[es] the database access rights which Alice has given him.” Randall, [0067]. “Once authenticated, the server passes to Bob’s device the information it requests.” Randall, [0067].

B. Mapping to Challenged Claims

1. Claim 1: [1PRE] A method comprising:

Randall teaches “a *method* of enabling a wireless information device to access data.” Randall, Abstract, [0002], [0006]. As discussed *supra* §IX.A, the method provides access control for a wireless device user to track the location of another wireless device user. As demonstrated in the sections below, Randall’s

method meets or renders obvious all elements of claim 1. Williams-Decl., [0263]-[0265].

- a. **[1A] displaying on a first wireless telephonic device a plurality of users, wherein each one of said plurality of users is associated to a different one of a plurality of wireless telephonic devices;**

Each of Randall’s “wireless information device[s]” can be a “radio telephone[]” or “smart phone[]”—i.e., a *wireless telephonic device*. Randall, [0002]; Williams-Decl., [XX]. Randall discusses some examples involving Alice and Bob, who are both users of wireless information devices. Randall, [0053], [0491] (“Bob’s...mobile phone”), [0505] (“Alice’s mobile device”); Williams-Decl., [0266]. Bob’s device is an exemplary *first wireless telephonic device* (as is Alice’s, because POSAs would have understood that Randall presents Alice and Bob as arbitrary examples illustrating functionality that is equally available to any wireless information device in Randall’s system). Williams-Decl., [0266].

Each of Randall’s wireless devices can have “a directory application” that “contains a user’s contacts list.” Randall, [0009]. A user’s “contacts database”—called their “Universe”—“is the list of all the entities known to an entity and to whom access to more private data is to be given.” Randall, [0511]. “Table 2” is “an example” of “Alice’s Universe.” Randall, [0511].

TABLE 2

<u>ALICES UNIVERSE</u>		
NAME	DETAILS	i-GROUP
Aardvark plumbers	Number, email, address etc . . .	contractors
Bently, John	Number, email, address etc . . .	friend
Coppermill Corp	Number, email, address etc . . .	contractors
Davies, Charles	Number, email, address etc . . .	work 1
Entwistle, Peter	Number, email, address etc . . .	partner, friend
Greenfield Ventures	Number, email, address etc . . .	business 1

As Table 2 shows, a user’s Universe displays *a plurality of users*. Williams-Decl., [0267]. Randall teaches that at least some of these users have their own wireless information devices. Randall, [0512] (“people in the list” can “look[] at” the user’s information “using an application on their...wireless information devices”), Appendix 1 p. 25 (user’s “address book” of contacts includes “mobiles you regularly phone”), [0511], Table 2 (showing “Number” of each contact). Thus *each one of said plurality of users is associated to a different one of a plurality of wireless telephonic devices*, where the claimed *plurality of users* can be the whole contact list of a user whose contacts all have wireless devices, or a subset of a contact list where the subset of contacts have wireless devices. Williams-Decl., [0268].

The Universe contacts database is both “stored on the i-server” and “cached on” the user’s “wireless information device[].” Randall, p. 23 Table 4 (“Auto-entering address book”), [0062]-[0063] (wireless device has “local copies of the

master information held on the central server(s)” including “contact numbers”), [0069] (wireless device “typically includes a cached version of all of [its user’s] information which is on the central server”). Like other server-stored data, the copy of the user’s contacts list on the wireless device is for “*display* in an appropriate application.” Randall, [0013], [0021] (“contacts application” on user’s device “allow[s] them to see” their contacts’ information), [0179] (if “user has allowed Buddies to see specific” information, “user should be able to easily determine this through their Buddy view”), [0222] (similar), [0400] (other user’s “unique ID” can be “store[d]” in user’s “contact manager”); Williams-Decl., [0269].

Table 2 shows “Alice’s Universe” as an example; Bob similarly has his own “Universe” contacts list, and Bob and Alice can each be included as contacts displayed in each other’s contacts lists. Randall, [0509]-[0510] (“Bob’s details” are in “Alice’s Universe” and “downloaded to Alice’s mobile device,” and likewise “Alice’s contact” is provided to “Bob’s device[.]”), [0060] (Bob “view[s]” “Alice’s contact information” on his device), p. 24 Table 4 (“Data freshness”: “visual indication” regarding “Alice’s contact information can be shown on Bob’s wireless information device”); Williams-Decl., [0270]. Even if Randall had not explicitly taught this, it would have been an obvious implementation option to allow any wireless device users to subscribe to the same functionality (including

contacts functionality and location functionality) in Randall's system, and to allow any user to include any other user in their contacts list. Williams-Decl., [0270].

Thus, Bob's contact list is displayed on Bob's wireless device and Alice's contact list is displayed on Alice's wireless device. Either meets [1A]. Williams-Decl., [0271].

To the extent the *plurality of users* displayed in [1A] must include the *first wireless telephonic device's* user, Randall's wireless device also displays its own user's "i-Data." Randall, [0505] ("Table 1[] is an example application view of Alice's i-Data" that "would be provided on Alice's mobile device to allow her to manage her data"), [0176]; Williams-Decl., [0272]. Additionally, implementing Randall's contacts list to display an entry for the wireless device's own user in addition to that user's contacts would have been an obvious known design choice to provide the user a convenient way of accessing the user's own shared data by selecting the user's own entry from the display in the same contacts list where the user can select other contacts to access their shared data. Williams-Decl., [0272]-[0273] (citing EX1028 ("Shankar"), FIG. 4, 6:56-7:55, corroborating POSAs' background knowledge in this regard).

b. [1B] receiving on said first wireless telephonic device a first manual input in a form of a selection of one of said plurality of users;

As discussed *supra* §IX.B.1.a ([1A]), Bob's device can display Bob's contacts list that includes Alice, and Alice's device can display Alice's contacts list that includes Bob, in Randall's system. Taking Bob as an example, Randall teaches that "[w]hen one of the people in [Alice's] list...looks at Alice[]...on their...wireless information device[]...in their contacts application" (i.e., when Bob selects Alice in his device's displayed contacts list), "they see a view onto Alice's personal data that is defined by Alice." Randall, [0512], [0049], [0053], [0067], [0509] ("Bob" is Alice's "contact" and has "access" to Alice's "information"); Williams-Decl., [0274]. That view is of a subset of Alice's "Identity" information which contains data "objects" that are "information relating to an individual." Randall, [0180]-[0187], [0118], [0505]-[0508], [0021]; Williams-Decl., [0274]. Bob's device can "display an icon or other shorthand" for such an object, and Bob can "select[] the icon or shorthand" to view "attributes of the object." Randall, [0022], [0060] ("Bob's device" can display "icon appearing next to Alice's contact information"). A "user's data object" in "a contacts application" can have a "location attribute" used to "show the position of the user." Randall, [0021].

Thus, Randall teaches, or at minimum renders obvious, that an entry representing Alice (by icon or other shorthand) can be displayed in Bob's contacts list, and Bob can select that entry to view Alice's location attribute (and Alice can do the same in her contacts list to view Bob's location). Williams-Decl., [0275]. POSAs would have understood this to disclose *a first manual input* meeting [1B], or at minimum to render such manual input obvious because manual input was a well-known way for wireless device users to input such a selection. Williams-Decl., [0275]; Randall, [0012] ("user could click on" data displayed on wireless device "to perform...actions"), [0146]-[0151] (user can take "action" on a "specific contact" in "their buddy list").

Additionally, it would have been obvious to implement Bob's device to allow Bob to manually select Alice from Bob's displayed contacts list to request Alice's location information. Manually selecting another user from a displayed contacts list was well-known in POSAs' background knowledge as a suitable option with reasonable expectation of success for "look[ing] at [another user's] ADS Number" to "see a view onto [that user's] personal data" (Randall, [0512]) such as location. Williams-Decl., [0276]-[0279] (citing corroborating EX1023 ("Smith"), 5:15-18, 6:53-7:3, 7:41-49, 9:42-61, 10:29-11:4, FIGs. 14-16; EX1027 ("Han"), [0033]; EX1018 ("Meadows"), FIG. 4A, 5:30-47; EX1022 ("Darling"),

41:1-15); *see supra* §VI.B, §VI.D, §§VI.E.1.a-VI.E.1.b (discussing POSAs’ background knowledge evidenced by Smith).

c. [1C] receiving on said first wireless telephonic device an input in a form of a login and a second manual input in a form of a password;

Randall teaches that “an entity seeking information,” such as Bob seeking Alice’s location, must be “[a]uthenticat[ed] (i.e. identif[ied]...)” by “the server recognising Bob’s device and determining the database access rights which Alice has given him.” Randall, [0067]. The user “Bob (as opposed merely to Bob’s device)” may be “authenticated” by inputting “a PIN” or “select[ing] [his] favourite colour/restaurant/recent film etc.[], with the server only authenticating Bob when he answers correctly.” Randall, [0067]. In some examples, this can be “relevant...where Bob borrows someone else’s wireless information device or uses a public device” to access both “his own personal information” and information of his contacts, including Alice. Randall, [0067]; Williams-Decl., [0280].

Because Bob can be authenticated as “Bob the person, rather than Bob’s device,” even when using “someone else’s” device or “a public device,” POSAs would have understood Randall to teach that Bob inputs a *login* (i.e., an identifier “identifying an entity seeking information” as purporting to be “Bob the person”) on the *first wireless telephonic device* he is using. Randall, [0067]; Williams-Decl., [0281]. The “PIN” or “select[ed] answer[] from a multiple choice” is a

password that, if it “correctly” matches what the server has stored as Bob’s “PIN” or “favourite colour/restaurant/recent film” (Randall, [0067]), authenticates that the user is truly Bob. Williams-Decl., [0281]; Randall, [0380] (“[t]he authentication can use...a basic WID and password/passphrase”). POSAs would have understood that *manual input* on the wireless device was a typical and obvious way for such identifier and PIN or answer word to be submitted by a person who is using the wireless device. Williams-Decl., [0282]-[0285] (citing corroborating EX1024 (“Carey”), FIG. 8, 7:67-8:10; EX1031 (“Laursen”), 8:55-9:5, 9:52-66, 11:37-43); EX1032 (“Muratov”), [0016], [0038], [0104]. Randall’s “authentication” can be used for access control “both locally and on the server” (Randall, [0380]), corroborating that it is input locally on the wireless device. Williams-Decl., [0281].

Alternatively, even if Randall had not explicitly taught *receiving on said first wireless telephonic device an input in a form of a login* and if Randall’s PIN or selected answer were not considered *a second manual input in a form of a password*, it would have been obvious to modify Randall to receive these inputs on Bob’s device to authenticate Bob. Using these inputs to authenticate a device user seeking another user’s information (including location) was well-known in POSAs’ background knowledge as a beneficial and commonly used option that would have been merely simple substitution of one known element for another

with predictable results. Williams-Decl., [0286]-[0294] (citing corroborating EX1024 (“Carey”), Abstract, 1:8-12, 3:18-34, 4:6-33, 5:5-28, 7:65-8:16, FIGs. 8-14; EX1019 (“Thomas”), 2:58-3:6, 5:49-54, 6:53-7:49, 6:53-7:3, 7:27-40; EX1029 (“Chern”), 6:55-7:20; EX1016 (“Sandhu”), [0023]-[0024]; EX1030 (“Futagami”), 8:56-67, 10:9-17; EX1022 (“Darling”), 2:1-12, 8:32-34); *see supra* §§VI.C-VI.D, §VI.E.1.c (discussing POSAs’ background knowledge evidenced by Carey); *KSR*, 550 U.S. at 416-18.

d. [1D] determining whether to allow access of location information for said one of said plurality of wireless telephonic devices associated to said selected one of said plurality of users,

Randall *determines whether to allow access of Alice’s device’s location information* when “the server recognis[es] Bob’s device and determin[es] the database access rights which Alice has given him.” Randall, [0067]; Williams-Decl., [XX]. “The database can define which entities can read different fields: Alice can therefore give Bob rights to read only certain fields in her database.” Randall, [0047]. As shown in Table 1, one of the fields in Alice’s “i-Data” (“Identity”) database is her device’s “GPS location,” and she has designated that field as only being accessible to users whom she has designated as part of the “i-Group” called “partner”. Randall, [0503]-[0512], [0116]-[0136] (“Identity” used for sharing “Location information”); Williams-Decl., [0295].

TABLE 1

<u>Alice's iData</u>			
Field/Attribute	Category	Details	i-Groups
First name	personal	Alice	all
Family name	personal	Edwards	all
Title	work	European Marketing Manager	all

TABLE 1-continued

<u>Alice's iData</u>			
Field/Attribute	Category	Details	i-Groups
Company Name	work	Wireless Information Device gets R Us	all
Company Address	work	1 Science Park Rd, London, N1	all
Company E-mail	work	alice.edwards@Wireless Information Device getsrus.com	business 1
Company switchboard	work	0207 200 2000	all
Company Direct	work	0207 200 2012	business 1
Mobile Phone	work	0840 1234 567	business 1, friends
Home Phone 1	work	0208 341 1234	friends, family
Home Address	work	25 The Gables, Hampstead, London, NW3	family
My photo	photos		friends
Childhood photo	photos		family
Home note	notice	Sorry about dinner ☹	partner
Work note	notice	In a meeting with Tim till 7pm	work 1
My mood now	mood	Very tired	all
Tel Call Subject		"Dinner Tonight"	
Bluetooth	location	Bluetooth pods 1000–1020 . . . Sentinel room 2 . . .	
GPS	location	London W1, Seymour St.	partner
Hobby	preferences	Photography, travel	friends
Book	preferences	Maverick	friends
AlbumOfTheWeek	InstaPoll		friends

Randall, Table 1 (annotated).

Thus, “[t]he I-server is up-dated with the location of a person...via a GPS wireless information device, which transmits location information to the i-server, enabling authorised people to track the location of [Alice’s] GPS wireless information device by polling the server.” Randall, p. 24 Table 4 (“People tracking”). “[S]ensitive information is only available to people in certain iGroups; allowing Alice to control what data they see.” Randall, [0509], [0136] (“Location information” is “[v]isible to specific people (or groups)”). “The extent to which this is visible to a Communicator” (e.g., Bob) “is dependent upon both their device and the visibility rights that the Target” (e.g., Alice) “has assigned to them.” Randall, [0128]. Thus, when Bob’s device polls the server by requesting Alice’s information, the server determines whether to allow access to Alice’s device’s GPS location by determining whether the received login and password properly authenticate Bob and whether Alice has designated Bob as a member of the i-Group she has designated as having access to her GPS location. Randall, [0067], [0503]-[0512]; Williams-Decl., [0296]-[0297].

- e. **[1E] wherein said determination includes identifying said user of said first wireless telephonic device from said plurality of users using said login and determining said password is associated with said login**

As discussed *supra* §IX.B.1.c ([1C]), POSAs would have understood Randall to teach, or, alternatively, it would have been obvious to implement

Randall such that the server uses an input *login* to identify Bob as the user to be authenticated as using the *first wireless telephonic device*, and an input *password* to determine whether it correctly matches the password stored as being associated with Bob (i.e., *associated with said login*) to authenticate that the user is truly Bob. Williams-Decl., [0298]. This “[a]uthentication (i.e. identifying an entity seeking information)” is part of “the server recognising Bob’s device” (including “[a]uthentication of Bob the person”) “and determining the database access rights which Alice has given him” (Randall, [0067])—which can include “authoris[ing] [Bob] to track the location of [Alice’s] GPS wireless information device by polling the server” (Randall, p. 24)—and, thus, is part of the “*determining*” in [1D] (*supra* §IX.B.1.d). Williams-Decl., [0298].

f. [1F] and determining whether said selected one of said plurality of users has provided access rights for said location information to said user of said first wireless telephonic device,

As discussed *supra* §§IX.B.1.d-IX.B.1.e ([1D]-[1E]), Randall’s “*determining*” of [1D] includes “determining the database access rights which Alice has given [Bob],” which includes *determining whether Alice has provided access rights for said location information* to Bob, meeting [1F]. Randall, [0067], [0503]-[0512], [0116]-[0136], p. 24 (“People tracking”); Williams-Decl., [0299].

- g. **[1G] and said first wireless telephonic device is operable to assign location access rights to said one of said plurality of wireless telephonic devices associated with said selected one of said plurality of users for obtaining a location of said first wireless telephonic device;**

Randall teaches that any “user must be able to switch location information on for a person or group of people..., i.e., being able to select the person and allow access” to make the user’s device’s location “[v]isible to specific people (or groups) for a specific period of time”—e.g., “for the half hour that the group of friends are trying to locate each other in town.” Randall, [0144], [0136], [0143]. This teaches that Bob can operate his *first wireless telephonic device to assign location access rights to Alice’s device for obtaining a location of Bob’s device*, meeting [1G]. Williams-Decl., [0300].

As another example, Randall teaches that “whenever Alice wishes to, she can change the level of access of a current contact—perhaps promoting Bob from ‘business’ to ‘friend.’” Randall, [0509]. This is a “method[] of making contacts into members of a particular i-Group.” Randall, [0509]. As discussed *supra* §IX.B.1.d ([1D]), a user can designate members of a particular i-Group as having access to the user’s device’s GPS location. POSAs would have understood this to be a generic example that is equally applicable to Bob as to Alice. Williams-Decl., [0301]; Randall, [0067] (“Bob also has stored on the server his own personal information”); *see supra* §IX.B.1.a. Thus, Bob could promote Alice from an i-

Group that Bob has specified as not having access to Bob's GPS location (e.g., a "business" i-Group) to an i-Group that Bob has specified as having access to Bob's GPS location (e.g., a "friend" or "family" or "partner" i-Group), thus using Bob's device to *assign location access rights* specifically and individually to Alice's device whose number is in Bob's contacts, meeting [1G]. Williams-Decl., [0301]. Alice would then have access to Bob's location when she is authenticated on her own device as listed in Bob's contacts, and/or when she is authenticated as Alice logging in from another device. Randall, [0067]; Williams-Decl., [0301]. "Access rights can be associated with individual entities, and can also be associated with groups of entities." Randall, [0070]. Thus, in one example, if Bob assigns Alice to the "partner" i-Group having access to Bob's GPS location and Bob has only one partner, then Bob is assigning location access rights only to Alice (and her device). Williams-Decl., [0301]-[0302]; Randall, p. 21 Table 1.

h. [1H] transmitting said location information from a server to said first wireless telephonic device;

Randall teaches that "[o]nce [Bob is] authenticated" as being truly Bob and as having been given "database access rights" by Alice to Alice's i-data that Bob is requesting, "the server passes to Bob's device the information it requests."

Randall, [0067]. As discussed *supra* §IX.B.1.d ([1D]), Alice's data accessed by Bob can include Alice's *location information*. Thus, Randall meets [1H].

Williams-Decl., [0303].

i. [1I] and displaying said location information on said first wireless device.

Randall's process discussed in the sections above enables "People tracking," whereby "[t]he I-server is up-dated with the location of a person" as "obtained via a GPS wireless information device, which transmits location information to the i-server, enabling authorised people to track the location of the GPS wireless information device by polling the server." Randall, p. 24. "As an example" of this, a "user's friends or parents etc who wish to track the user[']s location" can have "a 'map' application [on] their own devices, which could show their position on digital maps and also, by using the location attribute of the user's data object, it could also show the position of the user." Randall, [0021]. Thus, once Bob's *first wireless device* has received Alice's *location information* as discussed *supra* §IX.B.1.h ([1H]), it can display that information—e.g., on a map. Williams-Decl., [0304].

Randall teaches that requesting users "might initially have applications resident on their devices which allow them to see the [tracked] user's current telephone number and address perhaps integrated into a contacts application," and then "a 'map' application...show[s] the position of the [tracked] user." Randall, [0021]. Thus, the tracked user's (e.g., Alice's) location attribute is "handled by contacts...and map type applications" together (Randall, [0021]), reinforcing that Bob can select Alice from his contacts list to view her information including her

location on a map, as discussed in this §IX.B.1 (claim 1). Williams-Decl., [0305]-[0306]; *see* Randall, [0025] (“linkage is inherent because the data components work across multiple applications”), [0086] (services provide capabilities accessible “from anywhere in the device,” including “Location” capabilities accessible from various applications); [0094] (wireless device can have “a single capabilities framework into which all services are installed”), [0109]-[0115] (services can be strung together, so “service integration enables scenarios which span several services in the course of a single task flow”).

2. Claim 2

Randall’s wireless device uses “GPS” to determine its location and provide it to the i-server. Randall, p. 24 Table 4 (“People tracking”), p. 22 Table 1 (“GPS location”), p. 29 (“Route finder”). A POSA would have known that “GPS” stands for “global positioning system” and is *a positioning system* as claimed. Williams-Decl., [0307]. The ’283 patent admits this was prior-art “background” knowledge. EX1001, 1:14-28.

3. Claim 6

In Randall, Bob’s device *assigned location access rights* to Alice’s device as discussed *supra* §IX.B.1.g ([1G]). Bob can provide *a third manual input* that *modifies said location access rights* by, e.g., changing the period of time for which Alice has access to his location. Randall, [0144] (“The user must be able

to...select the person and allow access. Location information should only be visible for a pre-defined period of time. This period should be easily extensible by the user. At the end of the pre-defined period the location information should again become invisible.”); Williams-Decl., [0308]. Another way Bob can *modify said location access rights* is by “chang[ing] the level of access of a current contact” (e.g., Alice) by changing her i-Group membership in his contacts database. Randall, [0509]; Williams-Decl., [0308].

POSAs would have understood these to disclose *a third manual input* meeting claim 6, or at minimum to render such manual input obvious because manual input was a well-known way for wireless device users to input selections and settings. Williams-Decl., [0309]; Randall, [0012] (“user could click on” data displayed on wireless device “to perform...actions”), [0146]-[0151] (user can take “action” on a “specific contact” in “their buddy list”).

4. Claim 7

As discussed *supra* §IX.B.2 (claim 2), Randall’s mobile devices utilize GPS *to provide said location information*. POSAs knew that GPS uses *a triangulation process* to provide the location information based on signals received from several satellites. Williams-Decl., [0310] (citing corroborating EX1016 (“Sandhu”), [0004], [0020]; EX1019 (“Thomas”), 3:26-29; EX1020 (“Murphy”), 1:9-13;

EX1021 (“Divakaruni”), 1:29-59). The ’283 patent admits this was prior-art “background” knowledge. EX1001, 1:14-28.

Alternatively, it was a well-known, obvious design choice to use another type of *triangulation process* as an alternative to GPS to provide the *location information* Randall provides. Williams-Decl., [0311]-[0312] (citing corroborating EX1034 (“Enzmann”), 1:30-40, 2:16-41, 3:1-16, 4:25-38, 5:13-20; EX1035 (“Degnbol”), 5:7-11, 27:18-19, 31:1-2).

5. Claim 8

Randall meets the following elements of claim 8 for the reasons discussed in the corresponding section above. Williams-Decl., [0313]-[0326].

Element	Addressed in Section:
[8PRE]	IX.B.1 ([1PRE])
[8A]	IX.B.1.a ([1A]). Bob has a Universe (of contacts) similar to Alice’s Universe. <i>See</i> Randall, p. 22 Table 2. In Bob’s Universe, Alice’s name is <i>a first name associated to a first wireless telephonic device</i> , and another user’s name is <i>a second name associated to a second wireless telephonic device</i> . Williams-Decl., [XX].
[8B]	IX.B.1.b ([1B])
[8C]	IX.B.1.c ([1C])

[8D]	IX.B.1.d ([1D]), IX.B.1.h ([1H])
[8E]	IX.B.1.e ([1E])
[8F]	IX.B.1.f ([1F])
[8H]	IX.B.1.g ([1G])
[8I]	IX.B.1.h ([1H])
[8J]	IX.B.1.i ([1I])

As to element [8G], Randall’s server from which Bob accesses Alice’s location data is “a server on the Internet”—i.e., an “internet server[]” or “i-server”—which a POSA would have understood to be a *server located remotely from* the two wireless devices. Randall, [0053], [0028]-[0029], [0046], [0503], p. 24 Table 4 (“People tracking”); Williams-Decl., [0322]. Randall’s Figure 4 also illustrates the server(s) located remotely from the wireless devices. Williams-Decl., [0322].

Randall thus meets or renders obvious all limitations of claim 8. Williams-Decl., [0323].

6. Claim 9

See supra §IX.B.2 (claim 2). Williams-Decl., [0327].

7. Claim 13

See supra §IX.B.3 (claim 6). Williams-Decl., [0328].

8. Claim 15

a. [15PRE]-[15A], [15C]-[15E]

[15PRE]-[15A] are met for the reasons discussed *supra* §IX.B.1 ([1PRE]), §§IX.B.1.a-IX.B.1.b ([1A]-[1B]), and elements [15C]-[15E] are met for the reasons discussed *supra* §§IX.B.1.c-IX.B.1.h ([1C]-[1H]). Williams-Decl., [0329]-[0335].

b. [15B] locating said second wireless device;

See supra §IX.B.1.d ([1D]). Randall, p. 24 Table 4 (“People tracking” whereby “[t]he I-server is up-dated with the location of a person...obtained via a GPS wireless information device, which transmits location information to the i-server”). Williams-Decl., [0332].

c. [15F] displaying a map on said first wireless device with a marker representative of the location of said second wireless device.

As discussed *supra* §IX.B.1.i ([1I]), Randall teaches that Bob’s *first wireless device* can display a “digital map[]” that “show[s] the position of” Alice’s *second wireless device*. Randall, [0021]. POSAs would have understood that Alice’s “position” is a *location* and “show[ing]” it would involve displaying a *marker*. Williams-Decl., [0336]. Alternatively, it would have been an obvious implementation of this disclosure to show Alice’s location on the map by displaying a *marker* at that location on the map, because displaying a marker was well known in POSAs’ background knowledge as a beneficial and commonly used

option for representing a location of interest (including a current location of a person's wireless device) on a digital map. Williams-Decl., [0336] (citing corroborating EX1014 ("Wollrab"), 4:40-58, FIG. 4B (markers 44-2 through 44-5); EX1018 ("Meadows"), FIGs. 4b, 5b; EX1005 ("Sheha"), FIG. 5; EX1017 ("Grube"), FIG. 2, 4:38-57, 5:13-17, 6:14-27, 6:59-7:6).

9. Claim 16

See supra §IX.B.2 (claim 2). Williams-Decl., [0337].

10. Claim 17

As discussed *supra* §IX.B.1.c ([1C]), it would have been obvious to receive Bob's *password* as manual input on Bob's wireless device. It would further have been obvious to receive this input *on a first display screen*, because providing a display screen to receive password input was well-known in POSAs' background knowledge as a beneficial and commonly used practice for directing the user when and how to input the password. Williams-Decl., [0338]-[0341] (citing corroborating EX1024 ("Carey"), FIG. 8; EX1026 ("Engberg"), FIGs. 2A-2D; *see supra* §§VI.C-VI.D, §VI.E.1.c, §VI.E.10 (discussing POSAs' background knowledge evidenced by Carey).

X. GROUND 5: CLAIMS 3-5, 10-12, 14, 19-20 ARE UNPATENTABLE OVER RANDALL+WAKO

A. Randall-Wako Combination

Randall provides a “Route finder” service, “similar to GPS tracking in cars, but for mobile phones. You identify where you want to go, the phone knows where you are already. It can therefore give you step by step instructions on how to get there (eg. Turn left at the next lights. Carry on 100 metres. Go straight over the roundabout).” Randall, p. 29.

As discussed *supra* §VII.A, Wako discusses “[a] display method...for [a] navigation system for displaying information necessary for guiding a driver of a vehicle.” Wako, Abstract. POSAs would have recognized Wako’s techniques as the type of “GPS tracking in cars” techniques that Randall’s “Route finder” is “similar to” (Randall, p. 29). Williams-Decl., [0342]-[0344]. POSAs would therefore have had motivation and reasonable expectation of success in using Wako’s display techniques when implementing Randall’s “Route finder” service. Williams-Decl., [0344].

Further, Randall provides a “Rendezvous” service “on your mobile phone to help you meet friends and family in crowded or unfamiliar places. Temporarily you can elect to have your location visible to others—so using your phones everyone in your group can tell precisely where the others are.” Randall, p. 29. Randall teaches that “[a]t the touch of a button, your phone can display a map of

the area you are standing in” (Randall, p. 29) and it can also “show [your] position” and “the position of [another] user” (Randall, [0021]). POSAs would have understood and found it obvious from these disclosures that another user’s position can be “where you want to go” in Randall’s “Route finder,” which can “give you step by step instructions on how to get there” (Randall, p. 29).

Williams-Decl., [0345]. POSAs would have had motivation and expectation of success to use Wako’s techniques to provide an informative and useful display for this navigation functionality. Williams-Decl., [0345].

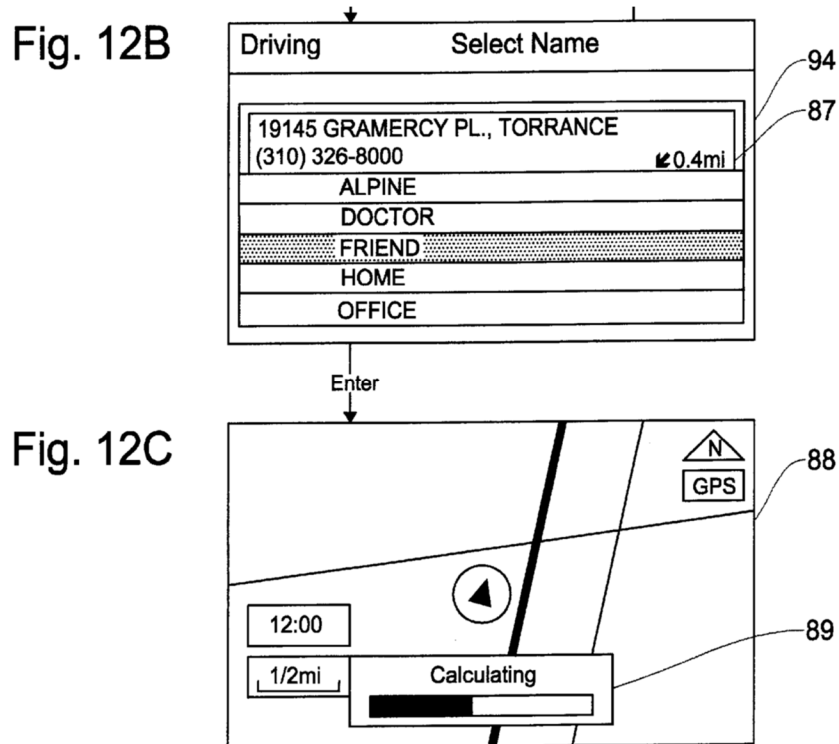
B. Mapping to Challenged Claims

1. Claims 3, 10, 19

As discussed *supra* §IX.B.1.a ([1A]), Randall’s wireless device displays a contacts list from which a contact can be selected to access their location; this occurs on the claimed *first display screen*. Williams-Decl., [0347]. The Randall-Wako combination discussed *supra* §X.A provides an option to select the contact from the displayed contacts list to access Route finder navigation to the contact’s location. Williams-Decl., [0347].

Wako likewise teaches that the user can select a contact’s name from a menu that “shows an address, phone number, a direction by an arrow, and a distance to location of the name highlighted in the name list.” Wako, 12:60-63. “By specifying the address of the destination in the ‘Select Names’ menu 94, the

navigation system changes to a confirm destination screen 88 in FIG. 12C wherein the CPU 49 (FIG. 3) calculates the optimum route to the destination.” Wako, 13:4-7.



Wako, FIGs. 12B-12C.

Wako’s FIG. 12C presents a second “Calculating” screen, separate from the contacts list screen, while the information the user has requested is being obtained. Williams-Decl., [0348]-[0349]. POSAs would have had motivation and reasonable expectation of success to provide a similar *second display screen* (which POSAs would have understood could just as easily display “Processing” or “Working” as “Calculating”) on Bob’s device *during said determination* of whether Alice’s location is accessible—e.g., to let Bob know that progress is being made and help

avoid user impatience. Williams-Decl., [0349]-[0350] (citing corroborating EX1033 (“Hoffman”), 21:58-61), [0360], [0367].

2. Claims 4, 11, 20

Claims 4, 11, and 20 add “*a third display screen...after said location information is transmitted...*” to limitations repeated from claims 3, 10, and 19, respectively (which are met as discussed *supra* §X.B.1 (claim 3)). Randall meets the added “*third display screen*” element for the reasons discussed *supra* §§IX.B.1.f-IX.B.1.g ([1F]-[1G]), where a map showing Alice’s location is provided on Bob’s device after Alice’s location information is transmitted to Bob’s device. Williams-Decl., [0351]-[0352]. POSAs would have implemented this as a “*third display screen*” to replace the “*second display screen*” discussed *supra* §X.B.1 (claim 3) by the updated map screen showing Alice’s location (and the surrounding map area) once the “Calculating” (or “Processing” or “Working”) represented by the *second display screen* is complete. Williams-Decl., [0352]-[0353], [0361], [0368].

3. Claims 5, 12

Claims 5 and 12 add “*a fourth display screen...that includes an option to obtain directions...*” to limitations repeated from claims 4 and 11, respectively (which are met as discussed *supra* §X.B.2 (claim 4)).

The Randall-Wako combination meets the claimed “fourth display screen” in two alternative ways.

First, as discussed *supra* §X.A, it would have been apparent to POSAs from Randall’s disclosures that another user’s location (e.g., Alice’s device’s location), which is displayed on a map, may be one of the disclosed places “where you want to go” that Randall’s “Route finder” can provide directions to (e.g., directions provided on Bob’s device to navigate from Bob’s device’s location to Alice’s device’s location). Randall, [0021], p. 29; Williams-Decl., [0354]-[0356]. It would have been obvious to provide Bob the option to obtain these directions in *a fourth display screen* so that Bob can view Alice’s location in the *third display screen* and then indicate in a *fourth display screen* whether he wishes to obtain directions to that location. Williams-Decl., [0356].

Second, as discussed *supra* §VII.C.3, a user would have expected an option to obtain a route to a location by interacting with a further display screen after receiving a location, such as disclosed in Wako. Wako, FIGs. 12B-12C, 12:35-13:37; Williams-Decl., [0357]. A POSA would have been motivated to implement such a *fourth display screen* in Randall to allow the user to make use of the received location, such as by choosing to navigate to the location. Williams-Decl., [0358]-[0359], [0362].

4. Claim 14

Claim 14 adds “*determining a travel time...*” to limitations repeated from claim 13 (which are met as discussed *supra* §IX.B.7 (claim 13)). The Randall-Wako combination meets the added limitation because Wako teaches to *determine a travel time* to the desired destination. Williams-Decl., [0363]-[0364].

As discussed *supra* §§VII.C.3-VII.C.4, Wako teaches to “include[.]...an anticipated time to reach the final destination” in “the route guidance screen,” and also teaches to determine the route that “requires the shortest time.” Wako, 9:8-22, 11:56-60. Both disclosures teach *determining a travel time* between the user’s device and the destination. Williams-Decl., [0365].

As discussed *supra* §X.A, it would have been apparent to POSAs from Randall’s disclosures that another user’s location (e.g., Alice’s device’s location), which is displayed on a map, may be one of the disclosed places “where you want to go” that Randall’s “Route finder” can provide directions to (e.g., directions provided on Bob’s device to navigate from Bob’s device’s location to Alice’s device’s location). Randall, [0021], p. 29; Williams-Decl., [0366]. In the Randall-Wako combination, *a travel time* between the locations of Bob’s device and Alice’s device is determined (and displayed) based on Wako’s teachings. Williams-Decl., [0366]. Because travel time was known to be an important piece of navigational information that a user of Randall’s “Route finder” would have

expected to see when reviewing driving directions to a destination, a POSA would have found it obvious to incorporate Wako’s travel time teachings into Randall’s “Route finder.” Williams-Decl., [0366].

XI. GROUND 6: CLAIM 18 IS UNPATENTABLE OVER RANDALL+ENGBERG

A. Randall-Engberg Combination

As discussed *supra* §IX.B.1.c ([1C]), Randall teaches or renders obvious that Bob may provide a login and password to a server when requesting Alice’s location information. As discussed *supra* §VIII, Engberg illustrates different known options for techniques for requesting such information, including requesting both a login and password on a single display screen or on successive display screens. Engberg, 4:52-65 (describing Figure 2A as showing a screen that is “similar or identical to standard login screens”), FIGs. 2A-2D; Williams-Decl., [0369]-[0371]. POSAs would have been motivated to use separate screens as a design choice to obtain login and password information from a user and would have had reasonable expectation of success because the same or similar information is already obtained by Randall’s system and Engberg corroborates that separate-screen approaches are similar to “standard login screens.” Engberg, 4:52-65, FIGs. 2A-2D; Williams-Decl., [0371]. Doing so in Randall’s wireless device would have been merely simple substitution of one known element for another with predictable results. *KSR*, 550 U.S. at 416-18; Williams-Decl., [0371].

B. Claim 18

As discussed *supra* §VIII.C, obtaining a login and password on different screens was a design choice well known to POSAs, e.g., if a device has limited screen space, or to ensure that a valid login is entered first, or to protect against shoulder surfing. Williams-Decl., [0372]. Further, Engberg discloses receiving a login on a first display screen and a password on a second display screen. Engberg, FIGs. 2C-D. While claim 18 recites “*first*” and “*second*” display screens, no ordering of the display screens is required by the claim. Williams-Decl., [0372]. Thus, the Randall-Engberg combination meets claim 18.

XII. NO BASIS EXISTS FOR DISCRETIONARY DENIAL

A. Section 314(a)

1. *Fintiv*

“[T]he PTAB will not deny institution based on *Fintiv* if,” as here, “there is compelling evidence of unpatentability.” Director’s Interim Procedure for Discretionary Denials, 5 (June 21, 2022) (“Interim Procedure”) (discussing *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (Mar. 20, 2020) (precedential)). That should conclude the *Fintiv* analysis.

If considered, the *Fintiv* factors also weigh against denial.

a. Stay Potential

Absent “specific evidence” how the court will rule on any stay motion, this factor is neutral. *Sand Revolution II, LLC, v. Cont’l Intermodal Group–Trucking LLC*, IPR2019-01393, Paper 24 at 7 (June 16, 2020) (“*Sand*”) (informative).

b. Trial Timing

A motion is pending to transfer the district-court proceeding to the Northern District of California (EX1036 at 8), where the median time-to-trial is 48.9 months (EX1037 at 66). Even if that motion were not granted, the current District Court’s scheduled trial date of November 3, 2025, is only about five months before an FWD is likely due. *See Zynga Inc. v. IGT*, IPR2022-00368, Paper 7 at 8-15 (Jul. 8, 2022) (instituting IPR with district-court trial date five months before FWD).

c. Litigation Investment

The district-court parties have invested little in invalidity-related issues, the scheduled *Markman* hearing is over seven months away (EX1038 at 3), and “a significant portion of work remains to be done in the district court proceeding—e.g., the completion of fact and expert discovery and dispositive motions.” *Protect Animals With Satellites LLC v. OnPoint Sys., LLC*, IPR2021-01483, Paper 11 at 14-15 (Mar. 4, 2022).

Moreover, Petitioners’ diligence weighs strongly against denial. Mullen’s district-court complaint asserted nine patents, collectively including 378 claims. Mullen’s infringement contentions assert 272 of those claims. EX1039.

Nevertheless, Petitioners filed this Petition less than five months after receiving Mullen’s infringement contentions and about four months before any statutory bar. *See Samsung Elects Co., Ltd. v. Mojo Mobility Inc.*, IPR2023-01089, Paper 11 at 19 (Jan. 11, 2024) (“[G]iven the number of claims asserted” across “seven patents,” petitioner “was diligent in filing the Petition” within “four months of service of infringement contentions, and approximately eight months after the Complaint was filed.”) (citing “*Fintiv*, Paper 11 at 11 (stating that ‘it is often reasonable for a petitioner to wait to file its petition until it learns which claims are being asserted against it....’))”).

d. Issue Overlap

This Petition challenges all twenty claims of the ’283 patent, only nine of which are asserted in district court. EX1039 at 2. This weighs against denial. *Markforged Inc. v. Continuous Composites, Inc.*, IPR2022-00679, Paper 7 at 32-33 (Oct. 25, 2022).

e. Litigation Defendants

This factor is neutral. *Id.* at 33.

f. Other Circumstances

The Petition’s “strong showing on the merits” weighs against denial. Interim Procedure, 3-5.

2. *General Plastic*

Discretionary denial under *General Plastic Indus. Co., Ltd. v. Canon Kabushiki Kaisha*, IPR2016-01357, Paper 19 (Sept. 6, 2017) (precedential as to §II.B.4.i) “is not justified” where, as here, first and second petitioners “do not have a significant relationship.” *Videndum Production Sols., Inc. v. Rotolight Ltd.*, IPR2023-01218, Paper 12 at 7 (Apr. 19, 2024) (“*Videndum*”) (director review). “Petitioner’s reliance on [an] earlier-filed” IPR, “even as a menu and roadmap, is not sufficient to create a significant relationship that favors denial.” *Id.* at 5 (internal quotation marks and citations omitted).

Here, “the instant Petition is the first filed by Petitioner[s] against the” ’283 patent. *Id.* Petitioners have “different allegedly infringing products and in different district court proceedings” than Apple (petitioner in prior IPR2023-00091), have not coordinated with Apple regarding the ’283 patent, and thus have no “significant relationship” with Apple. *Ford Motor Co. v. Neo Wireless LLC*, IPR2023-00763, Paper 28 at 7 & 10 (Mar. 22, 2024) (director review).

Moreover, this Petition presents not only Sheha-based grounds similar to IPR2023-00091, but also entirely new Randall-based grounds developed subsequent to Apple’s IPR.

Discretionary denial “is not justified.” *Videndum* at 7.

B. Section 325(d)

None of the references combined in this Petition's grounds were of record during prosecution of the '283 patent. Wollrab, Friedman, Grube, Meadows, Chern, and Enzmann were of record, but are used herein only as corroborating background references, different from any application in prosecution.

Apple's IPR2023-00091 "was terminated after institution but before a final written decision was issued," so "the concerns underlying § 325(d) are not implicated," and the references in that IPR are not considered "presented to the Office pursuant to § 325(d)." *BMW of N.A., LLC v. Michigan Motor Techs., LLC*, IPR2023-01032, Paper 14 at 16 (Jan. 29, 2024).

Furthermore, this Petition's Grounds 4-6 based on Randall, which was not of record in prosecution or in IPR2023-00091, themselves sufficiently warrant institution, regardless of the status of Sheha-based Grounds 1-3. *Current Lighting Sols., LLC v. Jiaxing Super Lighting Elec. Appliance Co., Ltd.*, IPR2023-00270, Paper 18 at 51 (Aug. 16, 2023).

XIII. CONCLUSION

The Board should institute review and cancel claims 1-20.

Dated: 2024-10-07

Respectfully submitted,

/Elisabeth Hunt/

Elisabeth Hunt, Reg. #67,336

CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. §42.24, the undersigned certifies that the foregoing Petition for *Inter Partes* Review contains 13,946 words excluding a table of contents, a table of authorities, Mandatory Notices under §42.8, a certificate of service or word count, or appendix of exhibits or claim listing. Petitioner has relied on the word count feature of the word processing system used to create this paper in making this certification.

Date: October 7, 2024

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on October 7, 2024, I will cause a copy of the foregoing document, including any exhibits or appendices filed therewith, to be served via Overnight FedEx at the following correspondence address of record for the patent:

Jeffrey D. Mullen
2212 Hassinger Lane
Glenshaw, PA 15116

Date: October 7, 2024

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.

XIV. APPENDIX: CLAIM LISTING

The following claim listing assigns labels (e.g., [1A], [1B], etc.) to certain claim elements for ease of reference.

Claim 1
[1PRE] A method comprising:
[1A] displaying on a first wireless telephonic device a plurality of users, wherein each one of said plurality of users is associated to a different one of a plurality of wireless telephonic devices;
[1B] receiving on said first wireless telephonic device a first manual input in a form of a selection of one of said plurality of users;
[1C] receiving on said first wireless telephonic device an input in a form of a login and a second manual input in a form of a password;
[1D] determining whether to allow access of location information for said one of said plurality of wireless telephonic devices associated to said selected one of said plurality of users,
[1E] wherein said determination includes identifying said user of said first wireless telephonic device from said plurality of users using said login and determining said password is associated with said login
[1F] and determining whether said selected one of said plurality of users has provided access rights for said location information to said user of said first wireless telephonic device,
[1G] and said first wireless telephonic device is operable to assign location access rights to said one of said plurality of wireless telephonic devices associated with said selected one of said plurality of users for obtaining a location of said first wireless telephonic device;
[1H] transmitting said location information from a server to said first wireless telephonic device; and
[1I] displaying said location information on said first wireless device.
Claim 2
The method of claim 1, wherein a positioning system is utilized to provide said location information.

Claim 3

The method of claim 1, wherein said selection occurs on a first display screen and a second display screen is provided on said first wireless telephonic device during said determination.

Claim 4

The method of claim 1, wherein said selection occurs on a first display screen, a second display screen is provided on said first wireless telephonic device during said determination, and a third display screen is provided on said first wireless device after said location information is transmitted to said first wireless telephonic device.

Claim 5

The method of claim 1, wherein said selection occurs on a first display screen, a second display screen is provided on said first wireless telephonic device during said determination, a third display screen is provided on said first wireless device after said location information is transmitted to said first wireless telephonic device, and a fourth display screen is provided that includes an option to obtain directions from said first wireless telephonic device to said one of said plurality of wireless telephonic devices associated to said selected one of said plurality of users.

Claim 6

The method of claim 1, further comprising receiving a third manual input, wherein said first wireless telephonic device assigned location access rights to said one of said plurality of wireless telephonic devices associated with said selected one of said plurality of users for obtaining a location of said first wireless telephonic device and said third manual input modifies said location access rights.

Claim 7

The method of claim 1, wherein a triangulation process is utilized to provide said location information.

Claim 8

[8PRE] A method comprising:

[8A] displaying on a wireless device a first name associated to a first wireless telephonic device and a second name associated to a second wireless telephonic device;

[8B] accepting a selection of said first name on said wireless device;
[8C] receiving manual input entered into said wireless device that includes a login and a password;
[8D] determining whether to transmit location information associated to said first wireless telephonic device from a server to said wireless device,
[8E] wherein said determining includes performing an identification process based, at least in part, on said manual input to identify the user of said wireless device
[8F] and determining whether said first wireless telephonic device has provided access rights for said location information for said identified user
[8G] and said server is located remotely from said wireless device, said first wireless telephonic device, and said second wireless telephonic device,
[8H] and said wireless device is operable to assign location access rights to said first wireless telephonic device for obtaining a location of said wireless device;
[8I] transmitting said location information to said wireless device based on said determination; and
[8J] displaying said location information on said wireless device.
Claim 9
The method of claim 8, wherein a positioning system is utilized to provide said location information.
Claim 10
The method of claim 8, wherein said selection occurs on a first display screen and a second display screen is provided on said wireless device during said determination.
Claim 11
The method of claim 8, wherein said selection occurs on a first display screen, a second display screen is provided on said wireless device during said determination, and a third display screen is provided on said wireless device after said location information is transmitted to said wireless device.

Claim 12

The method of claim 8, wherein said selection occurs on a first display screen, a second display screen is provided on said wireless device during said determination, a third display screen is provided on said wireless device after said location information is transmitted to said wireless device, and a fourth display screen is provided that includes an option to obtain directions from said wireless telephonic device to said first wireless telephonic device.

Claim 13

The method of claim 8, further comprising receiving a third manual input, wherein said wireless device assigned location access rights to said first wireless telephonic device for obtaining a location of said wireless device and said third manual input modifies said location access rights.

Claim 14

The method of claim 3, further comprising receiving a third manual input, wherein said wireless device assigned location access rights to said first wireless telephonic device for obtaining a location of said wireless device, said third manual input modifies said location access rights, and determining a travel time between said wireless device and said first wireless telephonic device.

Claim 15

[15PRE] A method comprising:

[15A] accepting on a first wireless device a manual selection representative of a second wireless device from a list representative of a plurality of wireless devices;

[15B] locating said second wireless device;

[15C] determining on a server whether said second wireless device has provided permission for said first wireless device to locate said second wireless device based, at least in part, on an identification of a login, that identifies the user of said first wireless device from a plurality of users, and password received by said first wireless device that is associated with said login and determining whether said user is associated with said permission,

[15D] and said first wireless device is operable to assign a second permission to said second wireless device for obtaining second location information of said first wireless device;

[15E] providing location information to said first wireless device based on said determination; and

[15F] displaying a map on said first wireless device with a marker representative of the location of said second wireless device.

Claim 16

The method of claim 15, wherein a positioning system is utilized to provide said location information.

Claim 17

The method of claim 15, wherein said password is received on a first display screen.

Claim 18

The method of claim 15, wherein said password is received on a first display screen and said login is received on a second display screen.

Claim 19

The method of claim 15, wherein said manual selection occurs on a first display screen and a second display screen is provided on said first wireless device during said determination.

Claim 20

The method of claim 15, wherein said manual selection occurs on a first display screen, a second display screen is provided on said first wireless device during said determination, and a third display screen is provided on said first wireless device after said location information is transmitted to said first wireless device.